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October 28, 2025
Report 2024-107

FACT SHEET

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California Healthy Youth Act

Greater Accountability Would Help Ensure That Districts Comply With All Aspects of the Law

Background

Since 2016, the California Healthy Youth Act (CHYA) has required school districts to provide comprehensive sexual health and HIV prevention education to all students in grades 7 through 12. Through CHYA, the State aims to provide students with the knowledge and skills necessary to protect their sexual and reproductive health from HIV, sexually transmitted infections (STIs), and unintended pregnancy and to have healthy, positive, and safe relationships. To accomplish these goals, CHYA establishes the topics districts must include in their instruction. In general, districts have adopted instructional materials for the purpose of addressing these topics. The Joint Legislative Audit Committee directed us to review how school districts have implemented CHYA and the degree to which they comply with CHYA's requirements. We conducted an audit of Long Beach Unified, Rocklin Unified, Sonoma Valley Unified, and Tulare Joint Union High School districts.

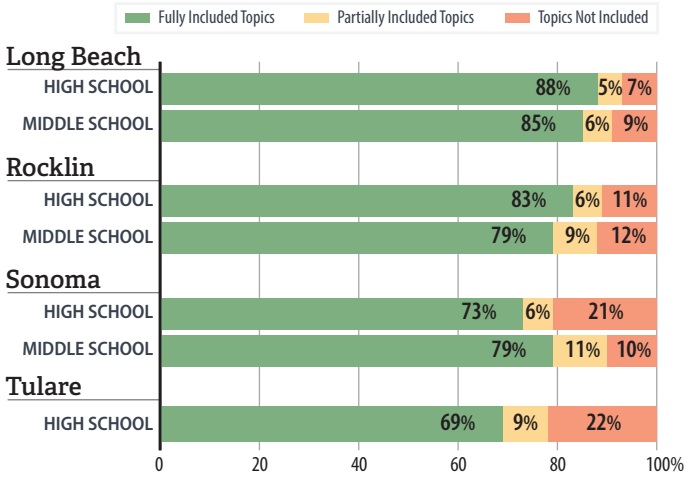
Key Findings

- The instructional materials we reviewed complied with about 70 percent to 90 percent of CHYA's content requirements.
  - » All districts we reviewed included required information about the nature of HIV and other STIs and provided students with knowledge and skills for making and implementing healthy decisions about sexuality.
  - » Districts commonly did not include required information related to human trafficking, health resources for students, sexual and relationship violence, and menstrual health.
  - » Teachers at some of these districts modified their instructional materials, in some cases increasing the risk of noncompliance with CHYA.
- Only Long Beach Unified provided its teachers with training related to CHYA. However, none of the districts we reviewed fully complied with CHYA's teacher training requirements.
- The districts did comply with CHYA's requirements to notify parents about instruction, as well as their rights to review instructional materials and opt students out of CHYA instruction.
- The California Department of Education (CDE) is not required to monitor districts' compliance with CHYA or publish guidance about instructional materials to help inform districts' choices about which materials to use.

Key Recommendations

- To improve compliance with CHYA, each district should perform a detailed review of CHYA's requirements and amend or supplement its instructional materials so that they address all required topics.
- Districts that have not provided teachers with training should adopt policies and procedures that define the frequency and content of training for teachers who provide CHYA instruction. The defined frequency should ensure that teachers receive timely training on the most recent, medically accurate information and that no teacher provides CHYA instruction without first having received that training.
- The Legislature should consider requiring CDE to perform monitoring reviews of CHYA compliance and to publish guidance to assist school districts.

Districts' Instructional Materials Did Not Comply With All of CHYA's Content Requirements



California Healthy Youth Act

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REPORT 2024-107

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Grant Parks *State Auditor*

Mike Tilden *Chief Deputy*

October 28, 2025
2024-107

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As directed by the Joint Legislative Audit Committee, my office conducted an audit of a selection of California school districts: Long Beach Unified (Long Beach), Rocklin Unified (Rocklin), Sonoma Valley Unified (Sonoma), and Tulare Joint Union High School (Tulare). Our audit reviewed how well these districts implemented the requirements of the California Healthy Youth Act (CHYA), which requires districts to provide instruction to students on a variety of topics related to sexual health, healthy relationships, and HIV prevention.

In general, we determined that the instructional materials used by these four districts complied with only about 70 percent to 90 percent of CHYA's content requirements, meaning that students were at risk of not receiving instruction on important topics. Furthermore, teachers at three of these districts modified the instructional materials they were supposed to use in ways that increased their risk of providing noncompliant instruction. For example, one teacher skipped a lesson that included required content about local health resources, and another used alternate materials that did not include any examples of same-sex relationships. We also evaluated the extent to which districts' materials included information about LGBTQ+ bodies and relationships. Although Tulare's and Sonoma's high school materials included less information than the others we reviewed, we found that all districts included information about LGBTQ+ bodies and relationships in their instruction.

In addition, CHYA requires school districts to provide their teachers with regular training. Only Long Beach provided teachers with training, but none of the districts fully satisfied CHYA's requirements for providing teachers with training on the most recent and medically accurate information related to human sexuality and HIV. We found that districts did comply with CHYA requirements to notify parents about upcoming instruction, as well as their rights to preview instructional materials and opt their students out of CHYA instruction.

Respectfully submitted,

GRANT PARKS
California State Auditor

Selected Abbreviations Used in This Report

AIDS	Acquired immunodeficiency syndrome
CDC	Centers for Disease Control and Prevention
CDE	California Department of Education
CHKRC	California Healthy Kids Resource Center
CHYA	California Healthy Youth Act
HIV	Human immunodeficiency virus
LACOE	Los Angeles County Office of Education
LGBTQ+	Lesbian, gay, bisexual, transgender, queer, and questioning (inclusive of other sexual orientations and gender identities)
PPP	Positive Prevention Plus
STI	Sexually transmitted infection

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Summary

Key Findings and Recommendations

The California Healthy Youth Act (CHYA) mandates that school districts provide students with comprehensive sexual health and HIV prevention education that is medically accurate, objective, and age appropriate. Districts must provide this education to students at least once in middle school or junior high (middle school) and once in high school. The law establishes requirements for the content that teachers must include in their instruction, such as instruction in HIV and sexually transmitted infection (STI) prevention. The law also establishes requirements for teacher training, notifications to parents and guardians (parents) about instruction, and parental rights to opt students out of the instruction. To conduct this audit, we surveyed school districts throughout the State and reviewed instructional materials and practices at four districts: Long Beach Unified School District (Long Beach), Rocklin Unified School District (Rocklin), Sonoma Valley Unified School District (Sonoma) and Tulare Joint Union High School District (Tulare). We conclude the following:

School Districts' Instructional Materials Did Not Comply With All of CHYA's Content Requirements *Page 9*

We found that the instructional materials at the districts we audited complied with about 70 percent to 90 percent of CHYA's content requirements. For example, the instructional materials often lacked information about sexual assault or about how mobile applications can be used for human trafficking. Additionally, teachers at three of the four districts modified instructional materials in ways that negatively affected the materials' compliance with CHYA or increased the risk that students would not learn about required topics. As a result, Long Beach high school students may not have received information about local health clinic resources, Rocklin middle school students may not have received information about specific gender-related topics, and middle school students at Sonoma were not provided instruction on legally available pregnancy outcomes. The Legislature also asked us to review whether districts' instruction included information about LGBTQ+ bodies and relationships. We found the four districts we reviewed all included some related information and that materials from Tulare and Sonoma's high school contained the least discussion of LGBTQ+ bodies and relationships when compared to the other districts we reviewed.

Districts Did Not Ensure That Teachers Received Training as the Law Requires, but Districts Did Comply With Parental Notification Requirements *Page 25*

CHYA requires that students receive instruction from trained teachers and that districts provide periodic training on new developments in the scientific understanding of HIV. However, none of the four districts could demonstrate

that they had provided training sufficient to meet CHYA's requirements. For example, Long Beach's training focused more on the format of its instructional materials than on the medical knowledge that teachers may need to accurately instruct students. District administrators at Sonoma and Tulare said that they were unaware of the training requirement, and Rocklin indicated that it trains its teachers on new curriculum only when it updates that curriculum every eight to 10 years. All four districts complied with CHYA's requirements to notify parents about upcoming instruction and their rights to preview instructional materials and to opt students out of the instruction. The law does not require districts to keep records of how many parents opt their students out of this instruction, and none of the districts we reviewed maintained such records for school years 2021–22 and 2022–23, the period the Legislature asked us to review. However, teachers and administrators told us that few or no parents typically opted students out of instruction each school year.

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Increased Guidance and Accountability Measures Would Better Ensure CHYA Compliance Statewide

CHYA does not require ongoing monitoring of school districts' compliance by any state-level entity. However, the California Department of Education (CDE) plans to begin monitoring CHYA compliance in the 2025–26 school year. CDE's monitoring plans represent a positive step toward ensuring that school districts consistently follow CHYA's requirements. However, CDE's monitoring is voluntary, and there is no legal requirement for CDE to sustain this oversight in future years. If CDE were to discontinue this oversight measure in the future, students in some districts may not receive the instruction that the Legislature has deemed vital to their sexual health. Further, although the State does not prescribe instructional materials that school districts must use, CDE identified no existing statute that would prohibit it from publishing guidance about materials, such as reviews of specific materials' compliance with CHYA requirements. If the Legislature directed CDE to publish these types of reviews, school districts could benefit when making decisions about which CHYA instructional materials to use.

To address our findings, we have made recommendations to Long Beach, Rocklin, Sonoma, and Tulare as necessary to modify their instructional materials so that their materials are compliant with CHYA and update them annually to ensure compliance with changes to the law. We also recommend that districts train their teachers on CHYA-required topics and track compliance with required training. Furthermore, we recommend ways that the Legislature could ensure that districts are better informed about the compliance of instructional materials and create ongoing monitoring of and accountability for districts' compliance.

Agency Comments

Long Beach, Rocklin, Sonoma, and Tulare generally agreed with our recommendations and indicated that they would implement them. CDE provided perspective on two of our recommendations to the Legislature.

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Introduction

Background

The California Department of Public Health reports that adolescent sexual health education provides youth with critical skills and knowledge to make healthy decisions about their sexual and reproductive health. In addition, research has shown that comprehensive, medically accurate, and developmentally appropriate sexual health education helps to prevent unintended pregnancy, HIV, and STIs. Effective January 2016, the State adopted CHYA, which mandates that school districts ensure that students receive comprehensive sexual health education and HIV prevention education in specified school grades. The text box shows the three general areas in which CHYA establishes requirements for school districts.

CHYA Includes Requirements in Each of These Areas

1. **Content:** Districts must teach specific information, such as the effectiveness and safety of all FDA-approved contraceptive methods in preventing pregnancy, and meet general requirements, such as using instruction and materials that are age appropriate.
2. **Teacher Qualifications:** Districts must ensure that teachers are knowledgeable about specific topics and receive periodic training on new developments in the understanding of HIV.
3. **Parental Rights and Safeguards:** Districts must notify parents about CHYA instruction planned for the coming year, notify parents that they can inspect the instructional materials, and advise parents about their right to opt their students out of some or all of the instruction.

Source: CHYA.

Two of CHYA's purposes are to provide students with the knowledge and skills necessary to protect their sexual and reproductive health from HIV, other STIs, and unintended pregnancy and to develop healthy attitudes toward adolescent growth and development, body image, gender, sexual orientation, relationships, marriage, and family. CHYA also aims to promote the understanding of sexuality as a normal part of human development and to ensure that students receive integrated, comprehensive, accurate, and unbiased sexual health and HIV prevention instruction. CHYA exists to provide students with the knowledge and skills necessary to have healthy, positive, and safe relationships and behaviors.

To satisfy these purposes, CHYA mandates the topics that districts must include in their instruction. Among these are HIV and STI prevention, contraception and legally available pregnancy options, and relationship and sexual violence. The required topics have changed since CHYA first took effect. For example, the State added topics related to human trafficking and, starting in 2025, expanded the definition of *comprehensive sexual health education* to include education about menstrual health and added a requirement that districts convey information about domestic violence hotlines.

CHYA requires school districts to ensure that all students in grades 7 through 12 receive comprehensive sexual health education and HIV prevention education at least once in middle school and at least once in high school. In the statewide survey we conducted during this audit, respondents most frequently reported providing CHYA instruction in grades 7, 8, and 9.

CHYA does not establish an oversight mechanism by which the State ensures that school districts comply with its requirements. CDE contracts with the San Joaquin County Office of Education for the operation of the California Healthy Kids Resource Center (CHKRC), which provides access to educational resources, including reviews related to instructional materials for CHYA. According to the information posted to its website, in school year 2020–21 the CHKRC coordinated with reviewers from CDE and the California Department of Public Health, among others, to review instructional materials for alignment and compliance with CHYA. These reviews assessed how well instructional materials aligned with CHYA and noted where publishers could make improvements. The results of these reviews are available online. However, neither the CHKRC nor the State recommends or endorses specific instructional materials to satisfy CHYA's requirements. Similarly, at the time of our audit, CDE's website neither provided information about approved or recommended CHYA instructional materials, nor did it indicate that CDE had performed any oversight of districts' compliance with CHYA.

This Audit Primarily Examines Four School Districts, All of Which Took Similar Approaches to Implementing CHYA

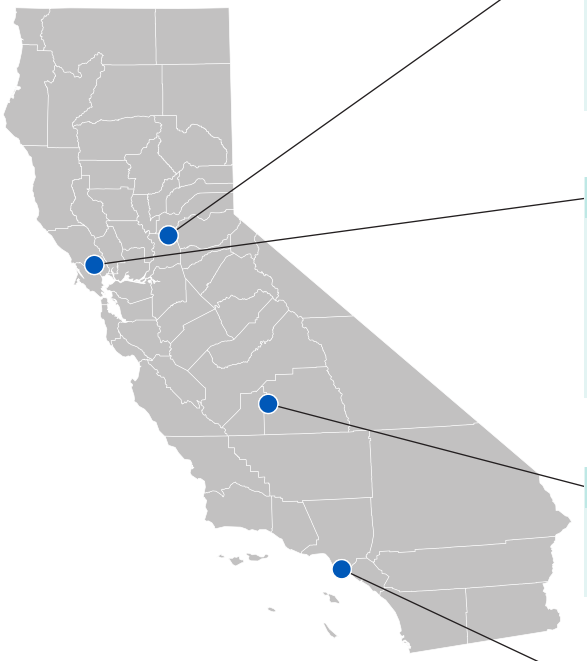
The objectives of this audit required us to conduct in-depth reviews of the CHYA instructional materials of several districts. In addition to conducting a statewide survey of all relevant school districts, we selected four school districts and reviewed their compliance with CHYA: Long Beach, Rocklin, Sonoma, and Tulare. We selected these districts because of the size of the student population, location of the school district, and the type of CHYA instructional materials the districts used. Figure 1 identifies location and enrollment information for these districts and presents the selected instructional materials for each district.

The four districts adopted specific instructional materials to assist them in meeting CHYA's requirements. In general, the districts reviewed instructional material options for quality and suitability for the district after the State's adoption of CHYA in 2016 and presented recommended materials to their district boards for approval.[1] The districts we reviewed provided CHYA instruction as part of other required coursework in middle school and high school. For example, Rocklin provides CHYA instruction to students as part of its 7th grade science curriculum and a 9th grade health class. Similarly, Sonoma also provides CHYA education in a 7th grade science class and in a 9th grade class on human and social development. Tulare includes CHYA instruction in the health unit of its freshman studies course—a required course for all 9th grade students. Long Beach also generally provides CHYA instruction to middle school students in a 7th grade health course, but it provides instruction to high school students in one of a variety of courses depending on students' individual schedules. In general, districts provided English learners with

[1] Tulare could not demonstrate that its board approved its instructional materials for the specific purpose of CHYA instruction. Instead, an administrator told us that an earlier edition of the district's textbook had been approved for use in a different setting. CHYA does not require districts to formally adopt materials to satisfy its requirements, and the administrator believed that it was not necessary for the district to obtain new approval to use the textbook to provide CHYA instruction.

instruction in these same classes and stated that they provided students whose individualized education plans placed them in settings other than the mainstream classroom with modified CHYA instruction designed to fit these students' needs. Instruction at each of these districts generally takes place over the course of two to five weeks at both the middle and high schools.

Figure 1
2024–25 Enrollment and Instructional Materials for the School Districts We Reviewed



Rocklin Unified School District

High School: 4,103 Students (grades 9–12)
Positive Prevention Plus, 2016 edition

Middle School: 1,772 Students (grades 7–8)
Positive Prevention Plus, 2016 edition

Sonoma Valley Unified School District

High School: 1,138 Students (grades 9–12)
Teacher-selected materials and lessons from Be Real Be Ready, 2019 edition

Middle School: 669 Students (grades 6–8)
Teen Talk, 2017 edition

Tulare Joint Union High School District*

High School: 5,280 Students (grades 9–12)
Glencoe Health and Human Sexuality, 2022 edition

Long Beach Unified School District

High School: 20,402 Students (grades 9–12)
Positive Prevention Plus, 2021 edition

Middle School: 14,124 Students (grades 6–8)
Positive Prevention Plus, 2021 edition

Source: CDE data, records of districts' boards adopting instructional materials, and auditor review of districts' instructional materials.

Note: These enrollment data do not include students enrolled at charter schools, which were not within the scope of this audit.

* Tulare is a high school district with no enrollment at middle school grade levels. We included Tulare in our selection to ensure a variety of instructional materials and geographic locations in our review.

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School Districts' Instructional Materials Did Not Comply With All of CHYA's Content Requirements

Key Points

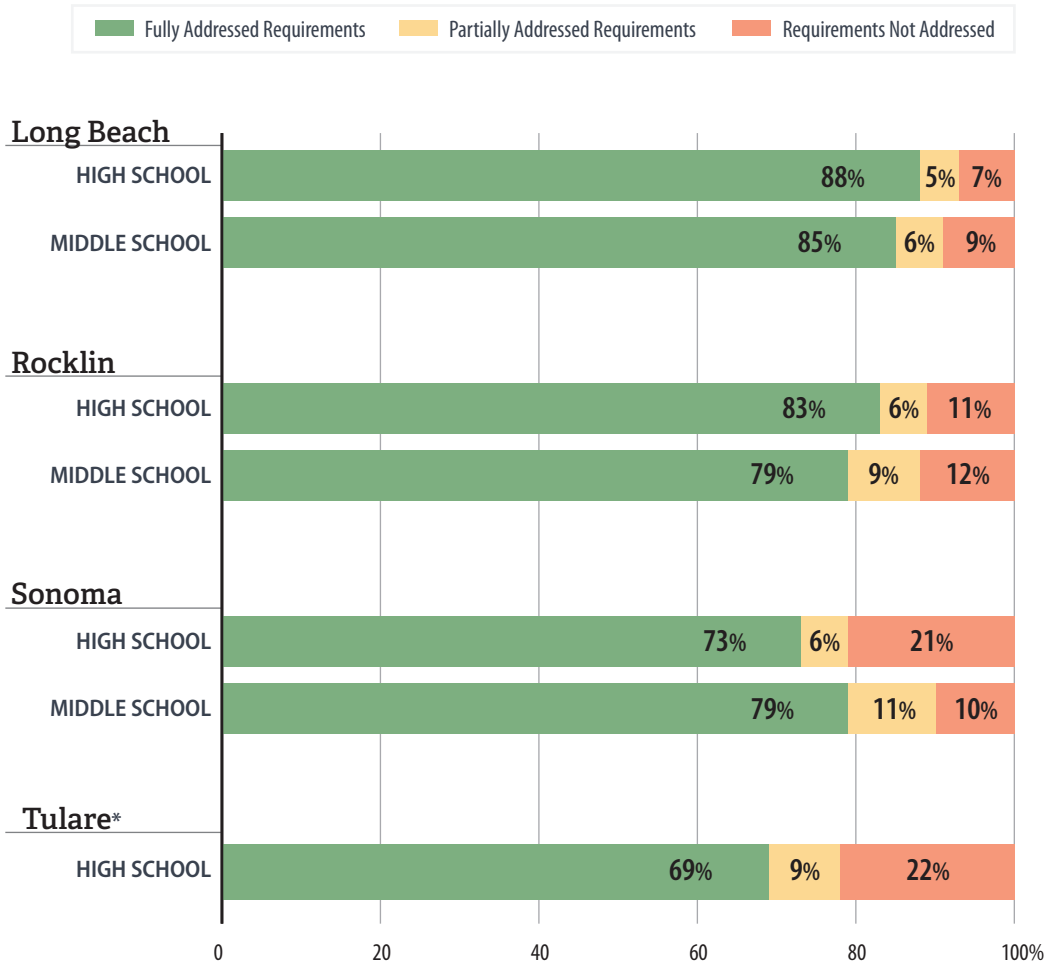
- The instructional materials used by the four districts we reviewed met about 70 percent to 90 percent of the content requirements established by the California Healthy Youth Act (CHYA). Because these materials were not fully compliant, students at these districts were at a greater risk of missing valuable instruction that could benefit their health and well-being.
- All four districts addressed topics related to LGBTQ+ bodies and relationships. All districts concentrated their discussion of these topics in lessons dedicated to gender or sexual orientation.
- Some teachers modified instructional materials in a way that negatively affected the materials' compliance with CHYA or increased the risk that students would not learn about required topics. For example, a teacher at Sonoma Valley Unified School District (Sonoma) largely used her own curated instructional materials, which did not feature examples of same-sex relationships, instead of the district-approved materials that did feature such examples.

The Instructional Materials We Reviewed Did Not Include All Required Topics

At all four districts we audited, the instructional materials we reviewed did not include all of the topics that CHYA requires districts to include in their instruction.[2] To determine the degree to which the districts' instructional materials complied with CHYA, we reviewed the materials—such as presentation slides or textbook content—that each district had most recently used at the time of our audit. We then compared the information in the materials to 105 different content requirements we identified in CHYA. As Figure 2 shows, the districts we audited used instructional materials that satisfied about 70 percent to 90 percent of the content requirements. Appendix A includes the detailed results of our compliance review.

[2] We reviewed the instructional materials used by each district, and we did not review actual classroom instruction. Later in this section, we explain in more detail how that affected our ability to determine each district's true compliance with CHYA.

Figure 2
Districts' Instructional Materials Did Not Comply With All of CHYA's Content Requirements



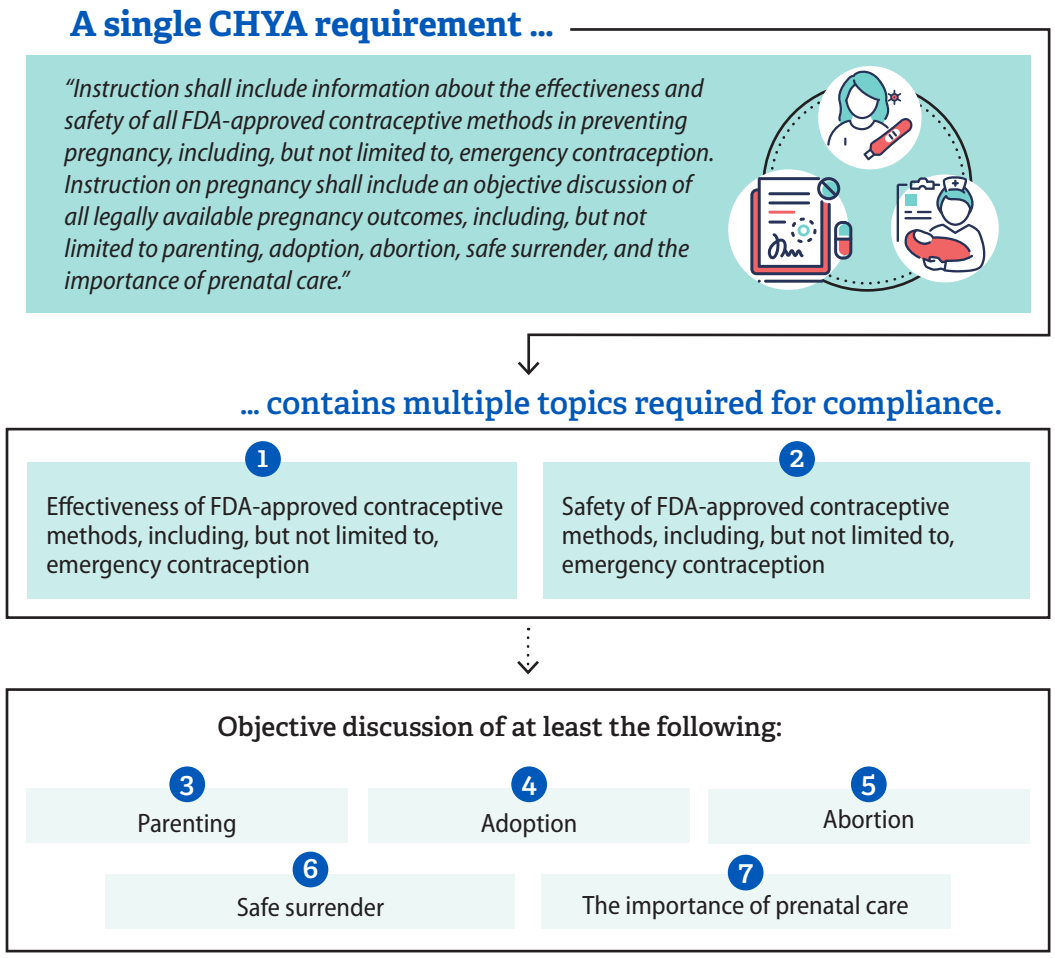
Source: CHYA and instructional materials from the districts.

Note: Figure 5 shows the areas of noncompliance that we found were common across several sets of instructional materials. Refer to Appendix A for detailed information related to our compliance findings.

* Tulare Joint Union High School District does not enroll students in middle school grades.

To determine the extent of compliance that Figure 2 shows, we considered CHYA's content requirements at a detailed level. Figure 3 illustrates how just one section of CHYA can include many topics a district must teach to be fully compliant. In cases where CHYA did not define topics or provide detail about how districts should meet its criteria, we used criteria from the Centers for Disease Control and Prevention (CDC) and other sources when determining whether instructional materials were compliant. For example, CHYA requires districts to include in their instruction "information about adolescent relationship abuse and intimate partner violence, including the early warning signs thereof." However, CHYA does not specify what early warning signs districts should teach. In this case, we reviewed instructional materials to see whether they included warning signs of abuse that were published by *Love Is Respect*, a project of the nonprofit National Domestic Violence Hotline.

Figure 3
CHYA's Requirements Can Contain Multiple Elements That a District's Instruction Must Include to Be Fully Compliant


A single CHYA requirement ...
"Instruction shall include information about the effectiveness and safety of all FDA-approved contraceptive methods in preventing pregnancy, including, but not limited to, emergency contraception. Instruction on pregnancy shall include an objective discussion of all legally available pregnancy outcomes, including, but not limited to parenting, adoption, abortion, safe surrender, and the importance of prenatal care."
... contains multiple topics required for compliance.
1
Effectiveness of FDA-approved contraceptive methods, including, but not limited to, emergency contraception
2
Safety of FDA-approved contraceptive methods, including, but not limited to, emergency contraception
Objective discussion of at least the following:
3
Parenting
4
Adoption
5
Abortion
6
Safe surrender
7
The importance of prenatal care

Source: CHYA.

We found that there was a set of content requirements—50 out of 105—with which all four districts' instructional materials complied. For example, all of the materials we reviewed included information about the nature of HIV and other sexually transmitted infections (STIs) and their effects on the human body, which are two CHYA requirements. All materials also encouraged students to communicate with trusted adults about human sexuality, provided information about HIV transmission and treatment, included information about the value of delaying sexual activity, and provided students with knowledge and skills for making and implementing healthy decisions about sexuality.

However, we also found a small number of requirements that all or most of the instructional materials did not address. For example, all materials except for those that Sonoma used at the middle school grade level lacked information about how mobile applications are used for human trafficking. Even the materials Sonoma

used only partially addressed this topic. Only the instructional materials from Tulare Joint Union High School District (Tulare) contained information about the safety of all FDA-approved methods that prevent or reduce the risk of contracting HIV.

In other cases, the districts' instructional materials only included enough information to partially comply with CHYA's requirements. For example, as of January 2025, CHYA has required school districts to ensure that their students receive education about menstrual health. Although CHYA does not define *menstrual health*, when it added the requirement to CHYA, the Legislature recognized the importance of instruction and materials that taught students about the menstrual cycle, premenstrual syndrome and pain management, menstrual hygiene, and menstrual stigma, among other things. Although all district materials we reviewed except Long Beach's high school level materials discussed either menstruation or the menstrual cycle, none of the districts' materials addressed the full span of information about menstrual health.

For four of CHYA's requirements, we found that districts included information that almost addressed a requirement but did not have sufficient detail to comply. Figure 4 provides examples. Also, CHYA requires instruction to include information on how social media and mobile device applications are used for human trafficking. Although materials for Long Beach at both the middle and high school grade levels and Rocklin at the high school grade level included information about the role of the internet in human trafficking, they did not explicitly describe or give examples of how social media sites and mobile applications are used for human trafficking. Consequently, we found these districts' materials did not comply with CHYA's requirements, despite having some related content.

Figure 4
Materials From Four Districts Did Not Comply With a CHYA Requirement Despite Offering Related Instruction

CHYA requires instruction to include information that abstinence from sexual activity and injection drug use is the only certain way to prevent HIV and other STIs.

None of these materials clearly meet CHYA's requirement.

Long Beach's high school and middle school materials ...
- Focus on sexual abstinence
- State that avoiding injection drug use is important to avoid infection
- State that infections can spread through injection drug use

Sonoma's middle school materials ...
- Identify needle sharing as a risky behavior for infection
- State that the primary way STIs are transmitted is sexually

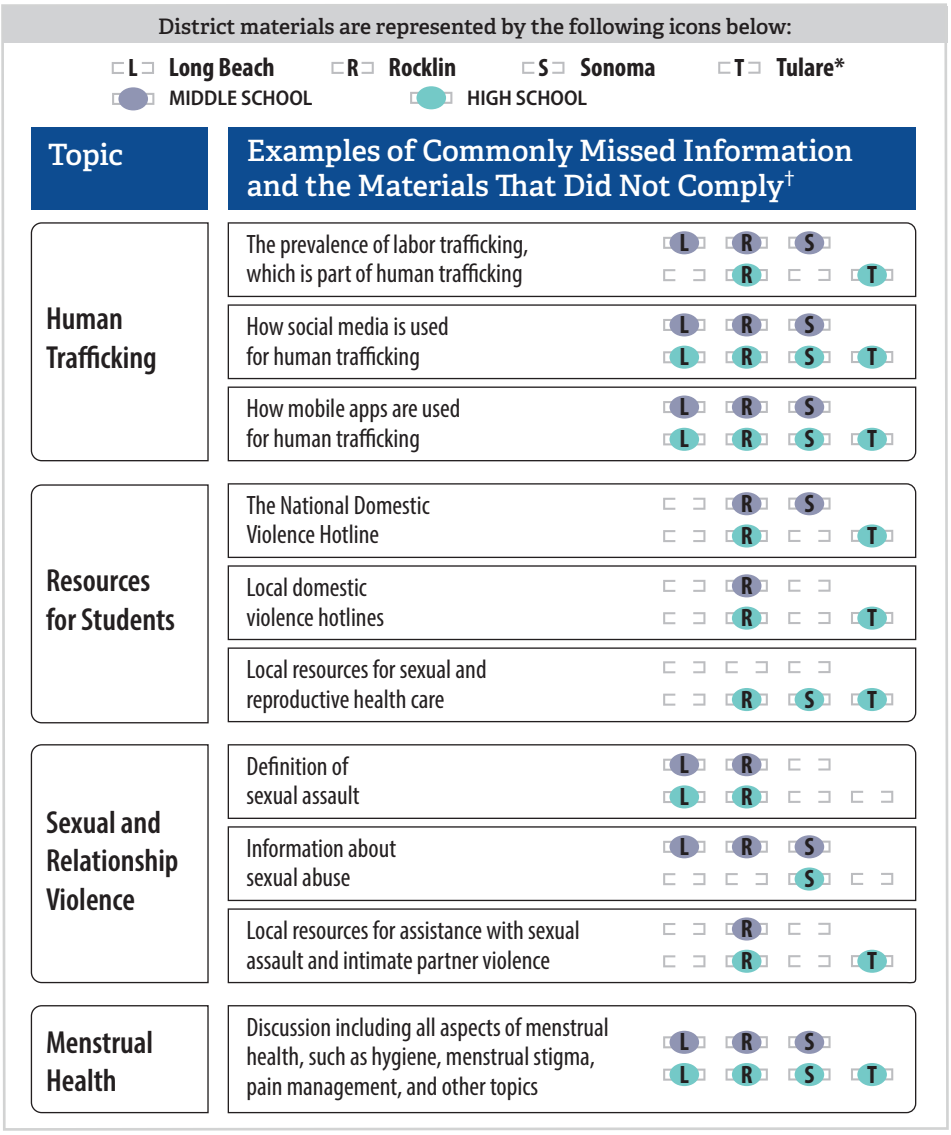
Rocklin's high school and middle school materials ...
- Focus on sexual abstinence
- State that avoiding injection drug use is important to avoid infection

Tulare's materials ...
- State that you should avoid injection drug use to lower risk of infection
- Classify injection drug use as a high risk behavior for infection
- Describe needle sharing as a common method of HIV transmission

Source: CHYA and the materials referenced.

At times, there were similarities to the noncompliance we found. For example, of the middle school level materials we reviewed, none included information on sexual abuse. None of the materials from Long Beach Unified School District (Long Beach) or Rocklin Unified School District (Rocklin) contained information about sexual assault, whereas Sonoma's and Tulare's materials addressed that topic. Because the districts' materials did not always cover required topics, there is a much higher risk that students will not receive instruction relevant to their safety, sexual health, and understanding of healthy relationships. Figure 5 shows the common types of noncompliance we observed in the instructional materials we reviewed.

Figure 5
For Some CHYA-Required Topics, Instructional Materials Had Similar Gaps in Compliance


District materials are represented by the following icons below:
L Long Beach
R Rocklin
S Sonoma
T Tulare*
MIDDLE SCHOOL
HIGH SCHOOL
Topic
Examples of Commonly Missed Information and the Materials That Did Not Comply†
Human Trafficking
The prevalence of labor trafficking, which is part of human trafficking
How social media is used for human trafficking
How mobile apps are used for human trafficking
Resources for Students
The National Domestic Violence Hotline
Local domestic violence hotlines
Local resources for sexual and reproductive health care
Sexual and Relationship Violence
Definition of sexual assault
Information about sexual abuse
Local resources for assistance with sexual assault and intimate partner violence
Menstrual Health
Discussion including all aspects of menstrual health, such as hygiene, menstrual stigma, pain management, and other topics

Source: Auditor review of CHYA instructional materials.

Note: Compliance with these select topics is not representative of districts' total compliance with all of CHYA's requirements.

* Tulare has no middle schools in its district.

† There are generally more requirements related to each topic, but we show a select few requirements with similar noncompliance issues in this figure. This is not an exhaustive list of requirements with which multiple districts did not comply.

In addition, the Legislature asked us to identify whether the districts' instruction included information about specific topics required by CHYA, such as sexual harassment, sexual assault, and adolescent relationship abuse. Table 1 shows those topics and our conclusions about whether the instructional materials we reviewed contained compliant information about each topic. As the table conveys, districts sometimes lacked sufficient information about sexual assault, adolescent relationship abuse, intimate partner violence, and sex trafficking. Because these are just a subset of CHYA's requirements, the absence of these specific topics does not necessarily indicate the overall degree to which instructional materials complied with CHYA.

Table 1
Districts' Instructional Materials Did Not Always Comply With Some of CHYA's Requirements Regarding Sexual or Relationship Violence

	DID THE INSTRUCTIONAL MATERIALS COMPLY WITH CHYA'S REQUIREMENTS ABOUT THE FOLLOWING?				
	SEXUAL HARASSMENT	SEXUAL ASSAULT	ADOLESCENT RELATIONSHIP ABUSE	INTIMATE PARTNER VIOLENCE	SEX TRAFFICKING*
Long Beach					
Middle School	Yes	No	No	No	Yes
High School	Yes	No	Yes	Yes	Yes
Rocklin					
Middle School	Yes	No	Yes	Yes	Yes
High School	Yes	No	Yes	Yes	Yes
Sonoma					
Middle School	Yes	Yes	No	No	Yes
High School	Yes	Yes	Yes	Yes	Yes
Tulare					
High School	Yes	Yes	Yes	Yes	No

Source: CHYA and auditor review of districts' instructional materials.

Note: Compliance with these select topics is not representative of districts' total compliance with all of CHYA's requirements. See Figure 2 and Table A for our assessments of total compliance.

* CHYA requires that instruction include information about human trafficking. This instruction can include both sex trafficking and labor trafficking. The assessment in this column focuses on whether instructional materials contained information about sex trafficking because that is the content the Legislature asked us to report about. Therefore, the results in this column do not correspond to our overall assessment of compliance with CHYA, wherein we sometimes found that instructional materials focused on sex trafficking and did not address labor trafficking.

CHYA requires that all instruction and materials align with and support its purposes, one of which is, in part, to ensure that students receive accurate and unbiased instruction. Accordingly, we also reviewed districts' instructional materials for instances of inaccuracy or bias. Specifically, we judgmentally selected and reviewed five elements of each district's instructional materials at each grade level. Middle and high school materials at Long Beach and Rocklin, as well as middle school materials

from Sonoma each featured statistics that were inaccurate or outdated. For example, Rocklin's high school and middle school level materials from 2016 used information from the CDC to state that about a quarter of teenagers report using contraceptive methods other than condoms. However, the CDC reported that in 2023, 33 percent of teens reported using hormonal birth control methods before their last sexual intercourse. Accordingly, we determined that these instructional materials only partially complied with CHYA's goal to ensure that students receive accurate and unbiased instruction. We also determined that Sonoma high school's materials only partially complied with this goal, as they contained some inaccuracies.

Some instances in the Rocklin and Tulare materials were more significant than others in our review. For example, in a discussion on abortion in Tulare's textbook, the textbook states that abortion is a surgery that carries the same risk as all surgeries. The text does not mention medication abortion. Because this presentation on abortion incorrectly defines *abortion* exclusively as a surgery, we believe it is inaccurate. Further, the instructional materials at Rocklin's high school level and Tulare refer to specific birth control options—intrauterine devices and emergency contraceptives, respectively—as being controversial. These materials do not describe why the birth control options are controversial, and we determined that this content was counter to CHYA's requirement for unbiased instruction because the information appeared to express an opinion about these options without related medical information, such as information about side effects or risks inherent in using these methods of birth control.

Because we only reviewed instructional *materials* and not classroom instruction, our testing was limited in its ability to determine actual compliance with the law. Specifically, our testing does not account for how teachers facilitated classroom discussions on CHYA-required topics. Consequently, there may be instances in which we could not locate information about a required topic in the instructional materials we reviewed, but a teacher may have orally addressed that topic when instructing students.

In fact, teachers and administrators sometimes told us that they addressed required topics, even though their materials did not cover them. For example, a high school teacher at Sonoma said they lead a discussion in their class about myths related to HIV and AIDS, which is a topic that CHYA requires districts to include in their instruction. However, we could not verify that this discussion took place based on the content of their instructional materials. A Tulare administrator also said the district would not expect to find certain topics, such as a discussion of social views on HIV and AIDS, included within its textbook, but would instead expect teachers to lead such a discussion in class. Although a guidance document the district provided establishes key learning objectives that are closely related—such as learning about myths and stereotypes about people infected with HIV—the guide does not direct teachers to lead a discussion on social views. Similarly, we did not identify in Tulare's instructional materials information about local health care resources. The administrator explained that the district offers students an on-site health clinic at two of its schools, which he was able to substantiate. However, the district could not provide documentation showing that information about these resources was included in its CHYA instruction.

Similarly, our compliance ratings do not account for times when teachers may have omitted required topics that were included in the instructional materials, thereby decreasing compliance. It is possible that even when district resources included CHYA-required topics, the districts' teachers did not actually cover those topics when instructing students. We note some instances in which this was the case in our subsequent discussion of modifications.

Rocklin generally agreed with our compliance determinations, whereas Long Beach and Tulare indicated that they disagreed with our analysis of their compliance. In response to our request for the district's perspective, Sonoma did not comment on our compliance determinations. At Long Beach, we neither identified information about sexual abuse in middle school instructional materials nor found information about sexual assault in either the middle school or high school materials. In response to our finding, a Long Beach district administrator highlighted that the district provides resources for how to access services related to sexual assault and abuse as part of its CHYA instruction. Despite the importance of sharing information about these resources, we do not agree that this effort alone satisfies CHYA's requirement to provide "information about" sexual abuse and sexual assault. We think such instruction would reasonably include a definition of these concepts, which Long Beach's instructional materials did not provide. After we shared the results of our review, Long Beach developed additional instructional materials to ensure that it complies with these and other CHYA requirements. We reviewed these materials and found that they were responsive to the areas of noncompliance that we noted and that the district would better ensure CHYA-compliant instruction in the future by using these materials.

Tulare told us that certain lessons in its textbook addressed multiple CHYA-required topics. However, for most of these topics we either did not find information on the topics in the lessons the district indicated, or we disagreed that the information was sufficient to address the topic. For example, the district told us that it teaches in two specific lessons about the nature and prevalence of human trafficking, how to safely seek assistance, and how social media and mobile applications are used for human trafficking. However, when we reviewed the materials, we found that they focused on violence in families, including spousal abuse and child abuse, or they discussed interpersonal conflicts and types of violence and abuse. We did not find any reference to human trafficking in these materials.

Because of staff turnover, the administrators we spoke with were generally unable to explain why their materials were not fully compliant with CHYA. An administrator at Long Beach said that, although she was not working for the district at the time it selected Positive Prevention Plus (PPP) as instructional material, her understanding was that the district had considered that the Los Angeles County Office of Education (LACOE) recommended PPP. At Rocklin, an administrator said he believed the district chose PPP because it perceived PPP as one of the only state-approved curricula at the time of adoption.[3] A Sonoma administrator said that in other cases, their district

[3] Although Rocklin shared its belief that PPP had been state-approved, the State has not recommended any specific curricula, as we discuss earlier.

typically will try to choose curricula that the State has officially adopted. However, the State does not have an approved list of materials. The Sonoma administrator also believed that the district's curriculum, Teen Talk, is advertised as compliant.

Administrators at the four districts we audited said they typically had not experienced significant barriers when implementing CHYA instruction. Teachers at three of the four districts told us they had difficulty covering all CHYA topics in class given the time allotted to this instruction. Because the scope of our audit did not direct us to review the comparative value of time spent on instructing in one required subject compared to another, we do not reach any determinations in this report about whether the time spent on CHYA instruction should be required to be a specific duration. We similarly asked school districts about challenges to implementing CHYA instruction in our statewide survey. Fifty-one percent of the respondents reported that they had not encountered barriers to implementation. However, 26 percent of respondents reported negative feedback from the community and parents regarding CHYA instruction as a barrier, and 14 percent listed the cost of developing and purchasing curricula as a barrier, among other challenges.

Districts could improve the accuracy and thoroughness of resources they provide to teachers to support further compliance, as Long Beach recently did. Because CHYA-required topics were missing from the instructional materials, districts were accepting a higher level of risk that their teachers did not address required content when teaching their class. If districts do not improve their CHYA instructional resources, they will have less assurance that their students are receiving the valuable instruction CHYA requires.

Districts Varied in Their Inclusion of Content Related to LGBTQ+ Bodies and Relationships

As part of this audit, the Legislature asked us to review whether selected school districts' CHYA instruction includes information about LGBTQ+ bodies and relationships. *LGBTQ+* stands for lesbian, gay, bisexual, transgender, queer, and questioning, and the *plus* symbol represents inclusivity of other sexual orientations and gender identities. California formally recognizes same-sex relationships through marriage and domestic partnerships and allows individuals to change birth and marriage records, as well as state-issued identification cards, to include either the female, male, or nonbinary gender. However, CHYA does not require districts to provide instruction on many topics related to "LGBTQ+ bodies and relationships." Therefore, to fulfill this audit objective, we consulted other resources, such as those published by public health departments and advocacy groups to identify topics that are related to LGBTQ+ bodies and relationships. As Table 2 shows, CHYA does require that instruction include some content related to LGBTQ+ bodies and relationships, but there are several other related topics that districts are not required to address.

Table 2
CHYA Does Not Require Districts to Provide Instruction on Many Topics Related to LGBTQ+ Bodies and Relationships

REQUIRED BY CHYA	NOT REQUIRED BY CHYA
• Affirmative recognition that people have different sexual orientations • During discussion of relationships and couples, or when providing examples, the instruction must be inclusive of same-sex relationships • Instruction about gender, gender expression, gender identity • An exploration of the harm of negative gender stereotypes	• Information about gender transitioning, including steps in gender transitioning such as hormone therapy • Definitions of intersex, intersex bodies • Information about how LGBTQ+ youth report increased experiences of trauma when compared to their straight and cisgender peers • Information about how LGBTQ+ people are more likely to be the victims of certain types of violence, including sexual violence and hate crimes • Descriptions of LGBTQ+ bodies in relation to health risks such as STIs • Definitions and examples of LGBTQ+ relationships other than same-sex relationships • Information about families with LGBTQ+ members, including with those members as parents • Information about experiences of intimate partner violence by sexual identity • Information about discrimination against people who are LGBTQ+

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Both required and non-required information on LGBTQ+ bodies and relationships support the purposes of CHYA, which include:

- To provide students with the knowledge and skills they need to develop healthy attitudes concerning adolescent growth and development, body image, gender, sexual orientation, relationships, marriage, and family.
- To provide students with the knowledge and skills necessary to have healthy, positive, and safe relationships and behaviors.

Source: CHYA and auditor research from California Department of Managed Health Care, The Trevor Project, the Williams Institute, Equity California, and the CDC.

The topics in Table 2 that CHYA does not require generally align with CHYA's overall purposes. For example, learning about these topics could help students with LGBTQ+ bodies or who are in LGBTQ+ relationships have the knowledge and skills to have safe and healthy relationships, which is one of CHYA's purposes. Additionally, such information could provide all participating students with the knowledge and skills they need to develop healthy attitudes regarding adolescent growth and development, body image, gender, sexual orientation, relationships, marriage, and family.

We performed two different reviews of the four districts' instructional materials to determine how the districts addressed topics related to LGBTQ+ bodies and relationships—both those that CHYA requires and those we identified in Table 2 as topics not required by CHYA. First, we examined the type and range of topics related to LGBTQ+ bodies and relationships the districts' instructional materials covered. Second, we examined the integration of topics related to LGBTQ+ bodies and relationships throughout the instructional material. We determined whether the materials were addressing topics not only in the sections dedicated to gender identity and sexual orientation but also in sections on puberty and anatomy, family planning and relationships, violence and abuse, reproductive health, and other topics.

Related to the type and range of topics, we determined that the four districts generally covered a common set of topics related to LGBTQ+ bodies and relationships. When discussing LGBTQ+ bodies, all instructional materials discussed information about intersex bodies and most discussed how LGBTQ+ youth report increased experiences of trauma and related events compared to their straight, cisgender peers, and the materials included examples of LGBTQ+ bodies in relation to common health concerns, such as STIs and unintended pregnancy. Furthermore, most districts' materials contained definitions and examples of types of LGBTQ+ relationships and included examples of families with LGBTQ+ members.

Conversely, there were several topics that only some of the districts' materials addressed. For example, only Long Beach's and Rocklin's materials included statements about how HIV disproportionately affects gay, bisexual, and other men who reported male-to-male sexual contact—which these materials discuss in their units on HIV. In addition, even though the instructional materials at Rocklin defined the term *transgender* and those at Long Beach explained how transgender individuals may face discrimination, only the high school materials for Sonoma and Tulare contained information about gender transitioning. These details were included in units about gender identity. Nevertheless, we identified the fewest examples of LGBTQ+ content overall in the high school materials for Sonoma and Tulare.

Related to the second factor we considered—the integration of these topics throughout the instructional materials—most of the districts' instructional materials concentrated the discussion of LGBTQ+ bodies and relationships into units that discussed gender identity and sexual orientation. Tulare's materials almost exclusively discussed these topics in those units. Long Beach and Rocklin also concentrated most of their discussion of LGBTQ+ bodies and relationships in just one unit of the instructional materials but spread the remaining content across units that covered subjects such as family planning, violence and abuse, and reproductive health. Finally, Sonoma's middle school materials were the only ones that included a discussion of LGBTQ+ bodies in a unit dedicated to discussing puberty and anatomy.

In addition to the four districts we audited, we reviewed instructional materials from 11 school districts that responded to our statewide survey and determined whether these districts' materials affirmatively recognized that individuals have different sexual orientations and whether, when providing examples of relationships, the materials

provided examples of same-sex relationships.[4] We found that eight of the 11 districts' instructional materials affirmatively recognized that people have different sexual orientations. Furthermore, we found that seven of the 11 were inclusive of same-sex couples when discussing or providing examples of relationships.

As we indicate above, the inclusion of more information related to LGBTQ+ bodies and relationships would support CHYA's purposes by providing students with further knowledge about how to develop healthy attitudes toward individuals with varied gender identities or sexual orientations and how to develop healthy relationships. Additionally, the results of a recently published study indicate that carefully designed, inclusive comprehensive sexual health education programs reduce beliefs that may lead to bullying, violence, and victimization, and may improve the mental, physical, and sexual health of students by decreasing internalized homophobia and transphobia.[5] If the Legislature wants to ensure more comprehensive instruction in information about LGBTQ+ bodies and relationships as part of CHYA, it would likely need to amend CHYA to require districts to cover more specific information and sufficiently integrate the information into the instruction.

Teachers at Three Districts Made Modifications to Instructional Materials That Increased Their Risk of Noncompliance With CHYA

Beyond the noncompliance in the instructional materials we discuss earlier, the instruction at certain school sites in Long Beach, Rocklin, and Sonoma was likely also noncompliant because of changes that individual teachers made to the instructional materials after district adoption.[6] These changes included removing presentation slides, replacing some of the district's approved materials with other content, or, in some cases, completely omitting lessons from instruction. Only Tulare's teachers did not make modifications to its materials that affected the district's compliance with CHYA. Table 3 summarizes the modifications we found and their effects on CHYA compliance.

Districts could reduce the risk that their teachers make modifications to their instruction that negatively affect their compliance by training their teachers about the law's requirements. CHYA includes training requirements that address how well-informed teachers are about specific subjects they will teach. For example, CHYA requires districts to provide periodic training to enable school district personnel to learn about new developments in the scientific understanding of HIV, and CHYA also requires teachers to provide instruction about HIV. However, these trainings related to background knowledge would not necessarily educate teachers

[4] To select these districts, we considered a number of factors, including the type and popularity of the curriculum the districts reported using, the size of the student population, and the districts' self-reported compliance rate.

[5] Kesler, K., Gerber, A., Laris, B. *et al*. High School FLASH Sexual Health Education Curriculum: LGBTQ Inclusivity Strategies Reduce Homophobia and Transphobia. *Prev Sci* 24 (Suppl 2), 272–282 (2023). https://doi.org/10.1007/s11121-023-01517-1

[6] Our presence in the classroom during instruction on potentially sensitive topics would have been disruptive. Therefore, we did not observe in-person instruction as part of our audit. Accordingly, our review does not extend to modifications teachers may have made while delivering CHYA instruction. In addition, in limited instances we were unable to determine how modifications teachers described to us or that we observed in their instructional materials affected their overall compliance with CHYA.

about the legal requirements for instruction. In other words, teachers can learn about new developments in the scientific understanding of HIV without being informed about the HIV-related topics the law requires them to teach. Without regular instruction on the law's requirements, teachers are at a greater risk of altering their instruction in a way that results in noncompliance with CHYA. None of the four districts we audited could demonstrate that they provided training to their teachers regarding CHYA's requirements before 2025. In 2025, Long Beach began providing training that included content on the requirements of CHYA, although it was unclear from the training materials how all of CHYA's requirements were explicitly covered in the training. As the results of our audit show, there may be a need for this type of training throughout the State.

Table 3
Modifications to CHYA Instruction Had Both Positive and Negative Effects on Compliance

	POSITIVE EFFECT ON COMPLIANCE	NO EFFECT ON COMPLIANCE	NEGATIVE EFFECT ON COMPLIANCE
Long Beach		A teacher skipped an instructional video that included a same-sex relationship example, because she believed the video was ineffective at connecting with students.	A teacher did not teach a lesson that included information about HIV testing and local health resources because she thought they were optional.
Rocklin	The district added a lesson on human trafficking.	The district removed one exercise related to gender identity and one on condom use. An administrator stated this was because of the conservative nature of the district.	A school removed presentation slides that provided information about gender expression. We could not determine the reason for this removal.
Sonoma	A teacher added material related to adolescent relationship abuse and intimate partner violence and warning signs of both.		A teacher skipped lessons that included examples of same-sex relationships and information on sexual abuse because they preferred to use alternate materials. A teacher skipped lessons on pregnancy options and sexual assault because of time constraints.

Source: Auditor review of districts' instructional materials and interviews with district and school staff.

Of the districts we reviewed, only Rocklin told us that it had made substantive changes at the district level, meaning that the changes applied to all schools within the district. None of those changes negatively affected the district's compliance with CHYA. An administrator at Rocklin stated that after adopting the 2016 edition of PPP, Rocklin incorporated an additional lesson on human trafficking. At Rocklin's high school level, the instructional materials we reviewed included this lesson, which helped the district comply with an update the State made to CHYA, effective January 2018, requiring districts to include information about human trafficking in their instruction. Although the district attested to providing the same human trafficking lesson to the middle schools, we found that the middle schools did not include the lesson in their instructional materials, and therefore the materials did not fully comply with CHYA's requirement.

Additionally, Rocklin removed two exercises from its instructional materials, one of which asked students to imagine what it would be like to be a different gender, and the other was a live demonstration of proper condom use in the high school materials. Rocklin explained that because of the conservative nature of the district, a previous administrator had decided to remove these exercises in consultation with school staff. We determined that by removing these two exercises, Rocklin did not negatively affect its CHYA compliance because the remaining content in the instructional materials was sufficient to meet CHYA's gender-related requirements. Furthermore, CHYA does not require a live condom demonstration, and the materials still covered condom use.

However, an additional change to the instructional materials at one of Rocklin's middle schools likely reduced compliance with CHYA's requirements that instruction and materials address specific gender-related topics. The school's instructional materials either omitted or included modified versions of several presentation slides from the original materials. These included slides that defined various terms related to gender, such as *transgender*, as well as images that illustrated the differences between gender expression, gender identity, how these concepts relate to sexual or romantic attraction, and the gender spectrum. As a result of these alterations, the school's compliance with CHYA requirements about gender expression depended entirely on whether the teacher at the time had provided the correct context to students, either through printed handouts or verbal discussions. A teacher from one of Rocklin's schools acknowledged making these changes but did not provide a reason why he did so. Rocklin's associate superintendent informed us that the district was unaware that the school had made these changes. The associate superintendent also acknowledged that the district's risk of noncompliance with CHYA increases when teachers modify instruction without the district's approval or knowledge.

Sonoma's schools made the broadest modifications to the district's approved materials among the four districts we reviewed. At the district's only comprehensive high school, the teacher responsible for CHYA instruction used only four of the 26 lessons included in the district's approved instructional materials. Instead, the teacher relied primarily on materials they selected from a variety of alternative sources because they believe it is important to keep the instruction up to date and that a prepackaged set of instructional materials may become outdated quickly. Because this one teacher taught all high school students receiving CHYA instruction in the district, and because their independently selected content is what students receive in the classroom, we evaluated their materials in the district-level compliance review we discuss earlier.

This teacher's instruction would likely have been more compliant had they used the materials the district approved. We found that the district's approved instructional materials included multiple required topics that the teacher's materials did not include. For example, we found that Sonoma's approved materials included information about sexual abuse and provided examples of same-sex relationships, whereas the teacher's materials did not include such detail. A district administrator explained that the district allows some flexibility in supplementing instructional materials, but in this instance there was an over-emphasis on supplemental material, and the district expected its approved materials to be the primary instructional materials. The district informed us that it intends to review our report with the high school teacher and to create a plan to ensure that the noncompliance we found is corrected.

At the Sonoma middle school we reviewed, one teacher supplemented the district's instructional materials. The district's copy of its middle school instructional materials did not include content related to adolescent relationship abuse, intimate partner violence, or the warning signs thereof, which are all topics CHYA requires districts to include in their instruction.[7] Accordingly, when we evaluated the district's compliance, we noted that the district did not address these topics. The district's materials also only partially included instruction on the knowledge and skills students need to form healthy relationships based on mutual respect and affection, which CHYA also requires. However, we did note that, as part of their instruction, this middle school teacher used informational videos about healthy and toxic relationships and consent. Because the teacher used videos that at least partially covered required topics, they increased the school's compliance with CHYA.

However, that same teacher also informed us that because of time constraints, they did not teach three lessons from the district's approved instructional materials. These omitted lessons included instruction on legally available pregnancy options and sexual assault, both of which are topics CHYA requires districts to include in their instruction. Because the teacher excluded these topics from instruction, their instruction did not comply with CHYA's requirements in these areas, resulting in additional noncompliance to the already existing ways in which the district's materials did not comply with CHYA. As a result, students did not receive information about two important topics and therefore may be less prepared to navigate related real-life situations in which they may find themselves. When we asked the district about this teacher's modified approach, a district administrator told us that the district expected teachers to use the district's approved instructional materials to teach required topics.

We identified a modification at a high school in Long Beach that may have affected compliance. At this high school, a teacher said that she understood two lessons in the district's approved curriculum to be optional. She did not teach those two lessons and described that she experiences time constraints when teaching the curriculum. One of these lessons emphasized that the only way to know whether someone is infected with HIV is to get tested—a required CHYA topic. Teaching that same lesson would also have prompted the teacher to provide local health clinic information and thereby fulfill a separate CHYA requirement to provide students with information about accessing local resources for sexual and reproductive health care. Because the teacher excluded this lesson, her instruction may not have complied with these two specific CHYA requirements. When we asked the district about this exclusion, a district administrator stated that it is the district's expectation that teachers cover this lesson, that the district plans to reiterate that expectation in upcoming training, and that it has provided teachers with a list of community resources meant to support this lesson.

Further, at a Long Beach middle school, we identified a modification that reduced the number of examples of same-sex relationships the instruction featured. When discussing or providing examples of relationships and couples, CHYA requires

[7] The Teen Talk 2017 instructional materials contain a lesson on healthy relationships that includes information about relationship abuse and how to identify harmful behaviors. However, Sonoma's copy of the materials was missing parts of this lesson, so we did not consider this content as part of the district's instruction when evaluating its compliance. When we brought this matter to the district's attention, it obtained the missing pages and intends to distribute them to teachers.

districts' instruction and materials to include same-sex relationships. A teacher at one of the district's middle schools reported not showing several of the videos included in the district-approved materials because she believed the style of the videos was ineffective at connecting with students. One of the videos she omitted contained an example of a same-sex relationship. However, the instructional materials also contained other examples of same-sex relationships and therefore the instructional materials overall were compliant with CHYA's requirement.

As we describe throughout this section, the changes Long Beach, Rocklin, and Sonoma made to their instructional materials were not the result of formal processes we could review, but were instead the result of ad-hoc decisions to make adjustments. Although teachers in Tulare also made modifications to their materials, such as using additional instructional slides with students, those changes did not negatively affect compliance because the slides were supplementary to the district's approved materials. Regardless, these changes were also not the result of a formal process we could review. As we previously discuss, training teachers about the law's requirements would improve their awareness about what topics they must cover and reduce the risk that their students may not receive all of the knowledge CHYA is designed to deliver.

Recommendations

Legislature

If the Legislature wants greater consistency in CHYA instruction related to LGBTQ+ bodies and relationships, it should amend CHYA to require districts to include more specific information and to integrate the information throughout instruction and materials.

To increase the likelihood that teachers provide instruction that complies with CHYA, the Legislature should amend CHYA to require teachers to receive regular training on CHYA's requirements and the scope of what must be covered.

Long Beach, Rocklin, Sonoma, and Tulare

To improve compliance with CHYA, Rocklin, Sonoma, and Tulare should perform a detailed review of CHYA's requirements and amend or supplement their instructional materials so that they address all required topics. Further, Long Beach, Rocklin, Sonoma, and Tulare should each annually review the information in their instructional materials to ensure that it is accurate, up-to-date, and complies with any changes to state law.

Districts Did Not Ensure That Teachers Received Training as the Law Requires, but Districts Did Comply With Parental Notification Requirements

Key Points

- None of the districts we audited could demonstrate that they trained teachers in accordance with CHYA's requirements. Long Beach provides training but could not show that the training materials aligned with CHYA's requirements. Rocklin, Sonoma, and Tulare have not established regular CHYA training. Because the districts have not established processes to adequately train their teachers, the quality of instruction those teachers provide to students may be lower than it otherwise would have been.

- Each of the four districts we reviewed notified parents about upcoming CHYA instruction, the parents' ability to preview instructional materials, and their right to opt their students out of the instruction. The Legislature asked us to calculate various statistics regarding participation in CHYA instruction, but CHYA does not require districts to maintain such records, and districts generally did not track the information that would allow us to address these questions.

None of the Districts We Audited Could Demonstrate That They Trained Teachers in Accordance With CHYA's Requirements

To comply with CHYA, districts must ensure that the individuals providing instruction have up-to-date information on specific topics about which they will teach. CHYA establishes two training requirements. First, CHYA requires districts to ensure that students receive instruction from teachers trained in the appropriate courses, which it defines as those with knowledge of the most recent medically accurate research on specified topics that the text box shows. To satisfy this CHYA requirement, districts must also periodically provide teachers with training about new developments in the understanding of abuse—including sexual abuse—and human trafficking, as well as current prevention efforts and methods. CHYA does not define how often teachers should receive training to meet this requirement. Second, CHYA requires districts to provide periodic training to enable school district personnel to learn about new developments in the scientific understanding of HIV. However, the law does not set specific intervals for this periodic training. Because both requirements aim to ensure that teachers are aware of new or updated information, we determined that to meet CHYA's requirements, districts would need to ensure that teachers receive training at some regular frequency. Therefore, we refer to these two requirements as *regular training*.

Training for CHYA Teachers

CHYA-compliant teachers are knowledgeable about the most recent, medically accurate research on the following topics:

- Human sexuality
- Healthy relationships
- Pregnancy
- HIV and other STIs

Source: CHYA.

Despite these requirements, of the four districts we audited, only Long Beach has an established process to train its teachers. Long Beach determined that the requirements for regular training meant that teachers needed training every three years. The district requires its teachers to receive training in providing sexual health education instruction to students before teachers deliver that material as well as every three years thereafter, in accordance with Long Beach's interpretation of CHYA's requirements. The district had contracted with LACOE to provide sexual health education training to its teachers until 2025 when it began to offer its own training in partnership with the city of Long Beach's Department of Health and Human Services. The district indicated that it formerly used paper sign-in sheets to monitor training attendance and began tracking teachers' compliance with its three-year training requirement through a training dashboard in March 2024. However, because the district's data did not have complete records about each teacher who provided CHYA instruction, we were unable to determine the extent to which Long Beach ensured that its teachers complied with its three-year training cycle requirement.

Further, it was not apparent from the training content that Long Beach shared with us that the training the district provided to its teachers through LACOE was sufficient to meet CHYA's requirements for regular training. LACOE provided the district with training on the PPP curriculum. Specifically, instead of addressing medical research or updates on the understanding of HIV, the training slides focused primarily on the format and content of the instructional materials, approaches for remaining neutral when teaching about potentially sensitive issues, and suggestions for dealing with difficult questions from students. According to Long Beach's science curriculum leader, the district believes that the publisher for its instructional materials keeps those materials up to date and medically accurate and, therefore, by requiring its teachers to attend the training on the instructional materials, the district was ensuring that the teachers were trained as required. However, because the 2022 training materials we reviewed did not clearly demonstrate that the training covered updated information on required topics, we could not verify that assertion. Consequently, we could not determine whether the training Long Beach used before 2025 met the requirements in CHYA. We also reviewed the training Long Beach has provided since 2025 and found that it was improved in some respects compared to the previous training, but it still did not address the full range of training required by CHYA. For example, the training provides information about STIs and HIV—information the previous training did not cover—but does not ensure that instructors are trained in the subjects of healthy relationships or medical information about pregnancy.

The other three districts have not established processes to ensure that their teachers receive the necessary training. District administrators at Sonoma explained that they rely on school administration to inform them when new teachers may need training. Rocklin and Tulare both described how, in general, experienced teachers at each school train new teachers on sexual health education materials. However, none of these districts had established requirements for regular training or tracked the frequency of teacher training. Rocklin said that its teachers obtained training when the district adopted PPP in 2017. Sonoma said that it believed the teachers who provide instruction had been trained in previous years, and Tulare said that turnover

in its administrative staff prevented it from demonstrating whether or when teacher training had occurred, although an administrator at the district believed that some teachers had been trained by a local health care provider.

The districts gave varying reasons for not establishing ongoing teacher training. Both Sonoma and Tulare indicated that they were unaware of the requirement for regular training. Rocklin indicated that it trains its teachers on new curriculum when it updates that curriculum. Its associate superintendent stated that the district follows CDE's recommendation of updating curricula every eight to 10 years. Notwithstanding Rocklin's understanding of the guidance it said CDE provided, we find that conducting training at that interval is not sufficiently frequent to meet the law's training requirements. The lack of timely training for teachers in these three districts may result in teachers not being knowledgeable about the most recent medically accurate research on human sexuality, healthy relationships, pregnancy, HIV, and other STIs, which could affect the quality of the instruction they provide to students.

The districts were generally open to the idea of adopting more robust and regular training. Sonoma did not identify anything that would prevent it from defining a reasonable frequency for providing training and establishing a process to ensure that teachers receive such training on CHYA-related topics at that frequency. Rocklin indicated that implementing more frequent periodic teacher training as CHYA requires was achievable, and Tulare similarly agreed that establishing a more robust training program was achievable and indicated that it had begun working with its county office of education to organize training.

CHYA allows districts to use contractors to provide sexual health education instruction and HIV prevention education to students, and the Legislature asked us to determine whether districts used contractors in this manner. We found that none of the districts we reviewed relied on contractors to provide instruction to students. Instead, the districts told us that their teachers provided the instruction during the period we reviewed—school years 2021–22 through 2023–24.[8] Further, about 24 percent of districts that responded to our survey reported using the services of contractors, including in-person classroom instruction and video-based instruction, as the primary method for delivering CHYA instruction.

Districts Appropriately Notified Parents About Sexual Health Education, but They Did Not Track Cases in Which Parents Opted Students Out of the Instruction

CHYA contains three key requirements that enable parents and guardians (parents) to make decisions about their students' participation in comprehensive sexual health education and HIV prevention education. First, districts must notify parents about the planned comprehensive sexual health and HIV prevention instruction that will occur in the upcoming school year. We refer to this as the *parental notice*. CHYA

[8] The administrator at Long Beach was unsure of whether the district used contractors to provide instruction in school year 2021–22 because she was not in her position at that time.

requires districts to provide the parental notice at the beginning of the school year or at the time parents enroll their students in the district. Second, districts must include in the parental notice an advisory that the written and audiovisual educational materials used in this instruction are available to parents for inspection. Third, districts must notify parents of their right to excuse their students from all or part of this instruction by notifying the district in writing of their request to opt their students out of the instruction. CHYA does not require parents to justify a decision to opt their student out of instruction, and it requires that alternative educational activities be made available to students whose parents have opted them out of this instruction.

Long Beach, Rocklin, Sonoma, and Tulare all notified parents about upcoming instruction, parents' ability to preview instructional materials, and parents' ability to opt their student out of instruction in academic years 2021–22 through 2023–24. For example, Long Beach posts guidance for parents and students on its district website, and it notifies parents about that website content. The guidance contains information about CHYA instruction and discusses parents' rights for previewing the instructional materials and for opting students out of that instruction. Further, Sonoma has an online registration process through which it provides parents with an annual parent's rights notification. This parental notice, which the district also posts on its district website, includes information about CHYA instruction and parents' ability to preview the instructional materials and opt students out of CHYA instruction. We also found that teachers we interviewed generally described sending notifications to parents weeks in advance of beginning instruction.

The four districts also notified parents that the instructional materials were available for review. Sonoma sent paper and electronic notices to parents telling them they could examine instructional materials, and Tulare sent an electronic notice to parents before the start of instruction, specifying that instructional materials were available for review at their school's main office. Long Beach and Rocklin provided parents with web links that allowed them to preview electronic versions of the instructional materials. However, despite the availability of material, the districts said that they had very few instances of parents requesting to preview the materials or attending open house events for that purpose. Each district indicated that it did not formally track requests to review the instructional materials or that it had not maintained records of those requests, and CHYA does not require districts to do so. Consequently, we could not determine the actual number of such parental requests or previews.

Each of the districts we audited acknowledged the parental right to opt students out of the required instruction and attested to facilitating those requests. Teachers and administrators from these districts also spoke about how rare these opt-out requests are. For example, one 9th grade teacher from Long Beach said that only two students had been opted out of her class during the years we reviewed. A 9th grade teacher from Sonoma indicated that they had not had an opt out in the last four years. At the two Tulare schools we reviewed, teachers reported one or two opt outs per year. The districts we reviewed described opt-out levels that aligned with the rates districts reported in our survey. Specifically, survey respondents that provided opt-out information generally reported few to no opt-outs each school year.

CHYA does not require districts to keep records of how many parents opt their students out of this instruction. The Legislature asked us to determine the number of students whose parents opted them out of CHYA instruction in school years 2021–22 and 2022–23 and the percentage of students who received CHYA instruction. None of the four districts we reviewed tracked opt-outs in those years, and the absence of opt-out records prevents us from reporting answers to these two questions. Only Long Beach recently started tracking opt-outs in 2023–24. Long Beach's records show that in that year, parents opted out of instruction a total of only eight middle school students and 11 high school students. The district's course enrollment data did not provide sufficient detail for us to calculate a percentage of students who received instruction in the 2023–24 school year.

Recommendations

Long Beach

To ensure that it complies with the training requirements in CHYA, Long Beach should review its teacher training program and modify the program as necessary to align with CHYA's requirements.

Rocklin, Sonoma, and Tulare

To ensure that districts periodically train all school district personnel who provide CHYA instruction, Rocklin, Sonoma, and Tulare should adopt policies and procedures that do the following:

- Define the frequency and content of training for teachers who provide CHYA instruction. The defined frequency should ensure that teachers receive timely training on the most recent, medically accurate information and that no teacher provides CHYA instruction without having first received that training.
- Track compliance with the required training.

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Increased Guidance and Accountability Measures Would Better Ensure CHYA Compliance Statewide

Key Points

- Our survey suggests that many districts use instructional materials that may not comply with CHYA. The large number of districts that use materials from the same publishers as the districts we audited, as well as districts' own reports of noncompliance, indicates an elevated risk of noncompliant instruction throughout the State.
- Because state law assigns the selection of instructional materials to local districts, CDE cannot require the use of preapproved materials. However, it could publish reviews of instructional materials to identify those that are more compliant and how to improve the compliance of published materials.
- Regular statewide monitoring of compliance would also likely help increase compliance. CDE is planning such an effort, but because it is not mandated, this monitoring could be deprioritized or discontinued.

If CHYA Required Regular Compliance Reviews and Instructional Material Reviews, District Compliance Would Likely Increase

In response to our statewide survey, many districts reported using instructional materials from the same publishers as the districts we reviewed. We summarize the most common instructional material choices in Table 4. Forty-one percent of responding districts said they used instructional materials from PPP, the same publisher as Long Beach and Rocklin. Another 19 percent said they use Teen Talk, the same as Sonoma's middle schools. It would be incorrect to assume that compliance rates at the districts that responded to our survey are identical to those we audited simply because they share an instructional materials publisher. Districts may have modified their instructional materials to increase compliance beyond the publisher's original content, or to decrease compliance if teachers did not cover portions of the materials. Nonetheless, the significant percentage of survey respondents that use the same publishers as some of our audited districts leads us to conclude that there is an elevated risk that many other districts also do not fully comply with CHYA. In fact, districts that responded to our survey reported areas of noncompliance with CHYA. Appendix B.1 provides more detail about the types of noncompliance that districts reported.

Table 4
Many School Districts We Surveyed Share an Instructional Materials Publisher With the Districts We Audited

INSTRUCTIONAL MATERIALS USED	NUMBER OF SURVEY RESPONDENTS	PERCENT OF SURVEY RESPONDENTS*
Positive Prevention Plus	215	41%
Teen Talk	102	19
Rights, Respect, Responsibility	27	5
Glencoe Health	17	3
Comprehensive Health Skills	8	2
Making Proud Choices	8	2
Check the Facts	7	1
Planned Parenthood	7	1
District Developed	16	3
Other	142	27

Source: School districts' responses to our survey.

Denotes instructional materials publisher used by one or more of the four districts we audited

* These percentages total more than 100 percent because some districts reported that they used multiple instructional materials.

To respond to the evidence we found of a statewide compliance problem, we assessed what statewide solutions could be helpful. We considered whether the State should require districts to use only preapproved instructional materials that CDE has determined align with all compliance requirements. However, such an approach would be significantly different from the current approach the State has taken to the adoption of instructional materials. Under state law, CDE does not have the authority to mandate that districts use specific instructional materials. Specifically, governing boards of school districts with one or more high schools are responsible for adopting high school instructional materials that comply with relevant law. Additionally, although the State Board of Education must adopt instructional materials for use in kindergarten and grades 1 through 8, districts are not required to use the materials the State Board of Education adopts. As long as instructional materials align with state academic content standards and otherwise comply with applicable law, districts may use them.

We also considered the potential benefit of CDE publishing guidance for districts about existing instructional materials so that districts could be informed of the relative compliance of these materials. Such guidance could take a similar form to the compliance reviews we describe in the Introduction; reviews that CDE has previously participated in creating. CDE indicated that there is no prohibition in statute that prevents it from publishing this type of guidance.[9] If the Legislature required CDE to regularly publish this kind of information, it could serve as a valuable resource for districts and would allow them to make more informed decisions about which

[9] CDE shared its belief that in doing so, it would have to consider the application of the Administrative Procedure Act, which generally requires due public process when adopting regulatory requirements.

instructional materials to adopt, as well as what changes they could implement to more fully comply with CHYA. CDE noted that it would likely require additional funding if it were to conduct such reviews.

Further, even if the State were to provide information about instructional materials, it would still lack assurance that districts were using compliant materials and providing the instruction as intended. Our audit found that some teachers in the districts we reviewed modified or omitted content from their district's approved materials, which led to decreased compliance with CHYA. There are also CHYA requirements related to parental safeguards and teacher training that are independent of the instructional materials that districts use; providing guidance about instructional materials would not affect statewide compliance with these other parts of CHYA.

Another effective approach would be for CDE to regularly review school districts to monitor their compliance with CHYA. In fact, CDE plans to begin monitoring CHYA compliance in the 2025–26 school year, has announced this, and has developed the tool it will use to do so. CDE informed us it intends to conduct nine to 20 CHYA monitoring reviews per year. To conduct its reviews using this tool, CDE intends to collect selected districts' entire CHYA-related middle school and high school curricula, including all supplemental instructional materials for each grade level. CDE also plans to request board policies and administrative regulations relating to CHYA implementation. CDE's staff told us there were various factors that contributed to its decision to monitor CHYA compliance, among which were guidance from CDE's leadership and available funding. Regardless of the reasons, this represents a positive step toward improving compliance oversight.

However, the action CDE is planning to take is voluntary, and therefore the State has no assurance that CDE will continue to review CHYA compliance in future years. Without a legal requirement to sustain this oversight, there is a risk that CDE could deprioritize or discontinue CHYA compliance monitoring in the future, leaving gaps in oversight and continuing the pattern we found of inconsistent compliance across the State.

Recommendations

To improve school districts' compliance with CHYA statewide, the Legislature should require CDE to monitor school districts' compliance with CHYA requirements and should also establish the minimum number of districts that CDE should review each year.

If the Legislature wishes to better position school districts to select instructional materials that comply with CHYA, it should require CDE to at least biennially publish on its website reviews of commonly available instructional materials that contain the following:

- A compliance score demonstrating how closely the materials align with CHYA.
- Information about what content is noncompliant or missing from the materials.
- Guidance explaining how school districts could supplement the materials in order to comply with CHYA.

We conducted this performance audit in accordance with generally accepted government auditing standards and under the authority vested in the California State Auditor by Government Code section 8543 et seq. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,

GRANT PARKS
California State Auditor

October 28, 2025

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Appendix A

Detailed Compliance Results for Four Districts' Instructional Materials

We reviewed instructional materials at four districts to determine whether each district included CHYA-required content. The materials we reviewed were the ones districts had most recently used at the time of our audit, and they included some materials not provided directly by publishers.

We summarize the results of our review in Table A, which shows a range of compliance across different CHYA requirements.

Table A
School Districts' Instructional Materials' Compliance With CHYA's Requirements Varied by Topic

	LONG BEACH		ROCKLIN		SONOMA		TULARE*
INSTRUCTION MUST ALIGN WITH THESE CONTENT REQUIREMENTS TO COMPLY WITH CHYA:	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**
– Nature of HIV and other STIs – HIV and STI effects on human body Education Code section (EDC) 51934(a)(1)	100%	100%	100%	100%	100%	100%	100%
– How HIV and other STIs are and are not transmitted – Relative risk of infection from specific behaviors EDC 51934(a)(2)	58	75	92	75	92	83	92
– Abstinence from sexual activity and injection drug use is the only certain way to prevent HIV and other STIs – Sexual abstinence in preventing pregnancy – Value of delaying sexual activity EDC 51934(a)(3)	86	86	86	86	100	93	86
– Effectiveness and safety of methods to prevent HIV and STIs, including antiretroviral medication EDC 51934(a)(4)	67	67	67	67	58	67	92
– Effectiveness and safety of reducing HIV transmission from injection drug use EDC 51934(a)(5)	100	100	100	100	100	100	100
– Treatment of HIV and other STIs – How antiretroviral medication can prolong lives and reduce HIV transmission EDC 51934(a)(6)	100	100	100	100	50	75	100

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	LONG BEACH		ROCKLIN		SONOMA		TULARE*
INSTRUCTION MUST ALIGN WITH THESE CONTENT REQUIREMENTS TO COMPLY WITH CHYA:	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**
– Social views on HIV and AIDS, addressing unfounded stereotypes and myths – Successfully treated individuals have a normal life expectancy – All people are at risk of contracting HIV – Testing is the only way to know HIV status EDC 51934(a)(7)	100%	100%	100%	94%	13%	100%	63%
– How to access local resources – Local resources for sexual and reproductive health care – Local resources for sexual assault and intimate partner violence EDC 51934(a)(8)	100	100	40	60	60	100	10
– Effectiveness and safety of contraceptive methods – Emergency contraception – Parenting, adoption, abortion, safe surrender – Importance of prenatal care EDC 51934(a)(9)	100	88	100	100	100	88	31
– Sexual assault, harassment, and abuse – Nature and prevalence of human trafficking – Strategies to prevent trafficking and seek help – How social media and apps are used for trafficking EDC 51934(a)(10)	75	55	65	45	70	60	50
– Adolescent relationship abuse – Intimate partner violence (IPV) – Early warning signs – Resources and hotlines available for victims EDC 51934(a)(11)	100	71	43	43	100	43	36
– Do not reflect or promote bias against any person on the basis of specific categories EDC 51933(d)(4)	100	100	100	100	100	100	100
– Affirmatively recognize different sexual orientations – Inclusive of same-sex relationships EDC 51933(d)(5)	100	100	100	100	50	100	50
– Gender, gender expression, and gender identity – Harm of negative gender stereotypes EDC 51933(d)(6)	100	100	100	100	50	100	75
– Encourage students to communicate with trusted adults about sexuality, provide knowledge and skills EDC 51933(e)	100	100	100	100	100	100	100
– Teach the value of and prepare students for committed relationships, such as marriage EDC 51933(f)	100	100	100	100	0	50	100

	LONG BEACH		ROCKLIN		SONOMA		TULARE*
INSTRUCTION MUST ALIGN WITH THESE CONTENT REQUIREMENTS TO COMPLY WITH CHYA:	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**	**MIDDLE SCHOOL**	**HIGH SCHOOL**
– Provide knowledge and skills for healthy relationships EDC 51933(g)	100%	100%	100%	100%	100%	75%	100%
– Provide knowledge and skills for implementing healthy decisions about sexuality – Include negotiation and refusal skills to assist students in overcoming peer pressure EDC 51933(h)	100	100	100	100	50	100	100
– Do not teach or promote religious doctrine EDC 51933(i)	100	100	100	100	100	100	100
– Align with and support the purposes of CHYA EDC 51933(c)	90	90	90	90	90	90	90
– Menstrual health EDC 51931(b)	0	50	50	50	50	50	50

Source: CHYA and auditor review of instructional materials.

* Tulare does not have middle schools.

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Appendix B

Summary of District Survey Responses

The Joint Legislative Audit Committee (Audit Committee) directed our office to survey high school districts, high school and middle school districts, and unified school districts to determine levels of compliance and at which grade levels the districts provide mandatory CHYA-compliant instruction.[10]

Table B.1 provides a summary of responses to questions related to instructional materials. Table B.2 provides a summary of responses to questions related to teachers and barriers to instruction. Table B.3 provides a summary of responses to questions related to parents opting students out of CHYA instruction. Table B.4 provides additional information about the percentage of students who received CHYA instruction from responding districts that reported this information to us. The data we compiled come from self-reported attestations in district responses to our survey.

Of the 894 school districts to which we sent the survey, 525, or 59 percent, returned valid responses to us. Five of these districts, those listed in the text box, responded that they do not provide CHYA instruction, although the information we reviewed about these districts indicates that the law requires them to do so. As a result, we report the responses of 520 districts in Table B.1, which is specific to how districts provide CHYA instruction. The number of responses in Table B.2, Table B.3, and Table B.4 varies based on the number of districts that provided responses to the corresponding survey questions.

Districts That Did Not Provide Students With Required CHYA Instruction

1. Bradley Union Elementary, Monterey County
2. Hacienda La Puente Unified, Los Angeles County
3. Le Grand Union High, Merced County
4. McKittrick Elementary, Kern County
5. Nuestro Elementary, Sutter County

Source: School districts' responses to our survey.

[10] *Unified school districts* are districts that provide instruction in kindergarten through 12th grade.

Table B.1
Summary of District Responses About CHYA Instruction

QUESTION	ANSWER CHOICES	RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT: BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL	PERCENTAGE OF RESPONDENTS
1. Does your district provide information on the nature of HIV, as well as other sexually transmitted infections (STIs), and their effects on the human body?	Yes	213	250	38	96.3%
	No	0	1	0	0.2
	Only in one grade level	18			3.5
2. Does your district provide information on the manner in which HIV and other STIs are and are not transmitted, including information on the relative risk of infection according to specific behaviors, including sexual activities and injection drug use?	Yes	209	246	38	94.8
	No	1	5	0	1.2
	Only in one grade level	21			4.0
3. Does your district provide information that abstinence from sexual activity and injection drug use is the only certain way to prevent HIV and other STIs?	Yes	206	246	38	94.2
	No	6	5	0	2.1
	Only in one grade level	19			3.7
4. Does your district provide information that abstinence from sexual intercourse is the only certain way to prevent unintended pregnancy?	Yes	209	246	38	94.8
	No	4	5	0	1.7
	Only in one grade level	18			3.5
5. Does your district provide information about the value of delaying sexual activity while also providing medically accurate information on other methods of preventing HIV and other sexually transmitted infections and pregnancy?	Yes	208	249	38	95.2
	No	1	2	0	0.6
	Only in one grade level	22			4.2
6. Does your district provide information about the effectiveness and safety of all federal Food and Drug Administration (FDA) approved methods that prevent or reduce the risk of contracting HIV and other STIs, including use of antiretroviral medication, consistent with the Centers for Disease Control and Prevention?	Yes	194	235	38	89.8
	No	9	16	0	4.8
	Only in one grade level	28			5.4
7. Does your district provide information about the effectiveness and safety of reducing the risk of HIV transmission from injection drug use by decreasing needle use and needle sharing?	Yes	191	236	38	89.4
	No	10	15	0	4.8
	Only in one grade level	30			5.8
8. Does your district provide information about the treatment of HIV and other STIs, including how antiretroviral therapy can dramatically prolong the lives of many people living with HIV and the likelihood of transmitting HIV to others?	Yes	189	226	36	86.7
	No	11	25	2	7.3
	Only in one grade level	31			6.0
9. Does your district provide a discussion about social views on HIV and AIDS, including addressing unfounded stereotypes and myths regarding HIV and AIDS and people living with HIV? This instruction shall emphasize that successfully treated HIV-positive individuals have a normal life expectancy, all people are at some risk of contracting HIV, and the only way to know if one is HIV-positive is to get tested.	Yes	195	236	38	90.2
	No	5	15	0	3.8
	Only in one grade level	31			6.0

QUESTION	ANSWER CHOICES	RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT: BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL	PERCENTAGE OF RESPONDENTS
10. Does your district provide information about local resources, how to access local resources, and students' legal rights to access local resources for sexual and reproductive health care such as testing and medical care for HIV and other STIs and pregnancy prevention and care?	Yes	200	232	38	90.4%
	No	5	19	0	4.6
	Only in one grade level	26			5.0
11. Does your district provide information about local resources for assistance with sexual assault and intimate partner violence?	Yes	191	229	38	88.1
	No	7	22	0	5.6
	Only in one grade level	33			6.3
12. Does your district provide information about the effectiveness and safety of all FDA-approved contraceptive methods in preventing pregnancy, including but not limited to emergency contraception? Instruction on pregnancy shall include an objective discussion of all legally available pregnancy outcomes, including, but not limited to, all of the following: parenting, adoption, and abortion; information on the law on surrendering physical custody of a minor child 72 hours of age or younger, pursuant to section 1255.7 of the California Health and Safety Code and section 271.5 of the California Penal Code; and the importance of prenatal care.	Yes	181	230	37	86.2
	No	8	21	1	5.8
	Only in one grade level	42			8.1
13. Does your district provide information about sexual harassment, sexual assault, sexual abuse, and human trafficking?	Yes	208	247	38	94.8
	No	4	4	0	1.5
	Only in one grade level	19			3.7
14. Does your district provide information about the prevalence, nature, and strategies to reduce the risk of human trafficking, techniques to set healthy boundaries, and how to safely seek assistance?	Yes	198	240	38	91.5
	No	10	11	0	4.1
	Only in one grade level	23			4.4
15. Does your district provide information about how social media and mobile device applications are used for human trafficking?	Yes	185	235	37	87.9
	No	19	16	1	6.9
	Only in one grade level	27			5.2
16. Does your district provide information about adolescent relationship abuse and intimate partner violence, including the early warning signs thereof?	Yes	203	240	38	92.5
	No	2	11	0	2.5
	Only in one grade level	26			5.0
17. Does your school district's CHYA instruction include information about the resources available to students related to adolescent relationship abuse and intimate partner violence?	Yes	189	231	37	87.9
	No	11	20	1	6.1
	Only in one grade level	31			6.0
18. Does the instruction include the National Domestic Violence Hotline and local domestic violence hotlines that provide confidential support services for students that have experienced domestic violence or stalking and are available 24 hours a day?	Yes	178	221	35	83.5
	No	20	30	3	10.2
	Only in one grade level	33			6.3

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QUESTION	ANSWER CHOICES	RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT: BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL	PERCENTAGE OF RESPONDENTS
19. My district's instruction and materials are made available on an equal basis to a student who is an English learner, consistent with the existing curriculum and alternative options for an English learner student as otherwise provided in state law.	Yes	216	248	37	96.4%
	No	3	3	1	1.3
	Only in one grade level	12			2.3
20. My district's instructions and materials are accessible to students with disabilities.	Yes	217	250	38	97.1
	No	1	1	0	0.4
	Only in one grade level	13			2.5
21. My district's instruction and materials are free from the reflection or promotion of bias against any person on the basis of specified categories, including disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, immigration status or, association with a person or group with one or more of these actual or perceived characteristics.	Yes	217	248	38	96.7
	No	0	3	0	0.6
	Only in one grade level	14			2.7
22. My district's instruction and materials affirmatively recognize that people have different sexual orientations and, when discussing or providing examples of relationships and couples, are inclusive of same-sex relationships.	Yes	204	239	38	92.5
	No	5	12	0	3.3
	Only in one grade level	22			4.2
23. My district's instruction and materials teach about gender, gender expression, gender identity, and explore the harm of negative gender stereotypes.	Yes	200	239	37	91.5
	No	7	12	1	3.9
	Only in one grade level	24			4.6
24. My district's instruction and materials encourage students to communicate with their parents, guardians, and other trusted adults about human sexuality, and provide the knowledge and skills necessary to do so.	Yes	213	250	36	96.0
	No	2	1	2	1.0
	Only in one grade level	16			3.1
25. My district's instruction and materials teach the value of and prepare students to have and maintain committed relationships, such as marriage.	Yes	191	231	35	87.9
	No	20	20	3	8.3
	Only in one grade level	20			3.8
26. My district's instruction and materials provide students with the knowledge and skills they need to form healthy relationships that are based on mutual respect and affection, and are free from violence, coercion, and intimidation.	Yes	211	248	38	95.6
	No	3	3	0	1.1
	Only in one grade level	17			3.3
27. My district's instruction and materials provide students with knowledge and skills for making and implementing healthy decisions about sexuality, including negotiation and refusal skills to assist students in overcoming peer pressure and using effective decision-making skills to avoid high-risk activities.	Yes	210	247	38	95.2
	No	3	4	0	1.3
	Only in one grade level	18			3.5

QUESTION	ANSWER CHOICES	RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT: BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL	PERCENTAGE OF RESPONDENTS
28. My district's instruction and materials are free from the teaching or promotion of religious doctrine.	Yes	218	250	38	97.3%
	No	0	1	0	0.2
	Only in one grade level	13			2.5

Source: School districts' responses to our survey.

Indicates the percentage of respondents that asserted compliance was less than 90 percent.

Table B.2
Summary of District Responses About Teachers and Barriers to Providing CHYA-Required Instruction

QUESTION	ANSWER CHOICES	RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT: BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL
1. Which of the following describe your district? (Check all that apply)	My district currently uses materials developed by a third-party as the primary basis for its CHYA instruction.	184	212	27
	My district formerly used materials developed by a third-party as the primary basis for its CHYA instruction, but no longer does so.	11	17	3
	My district has never used materials developed by a third-party as the primary basis for its CHYA instruction.	15	8	3
	My district currently uses the services (in-person classroom instruction, remote learning, video based instruction, etc.) of a third-party as the primary method for delivering CHYA instruction.	43	72	9
	My district formerly used the services (in-person classroom instruction, remote learning, video based instruction, etc.) of a third-party as the primary method for delivering CHYA instruction, but no longer does so.	22	13	2
	My district has never used the services (in-person classroom instruction, remote learning, video based instruction, etc.) of a third-party as the primary method for delivering CHYA instruction.	45	53	5
2. How does your school district ensure that instruction and materials are age appropriate? (Check all that apply)	Instruction and materials are reviewed by school district personnel, including teachers	204	222	36
	Instruction and materials are reviewed by a committee including stakeholders such as parents and outside groups	93	103	13
	Instruction and materials have been reviewed by the California Department of Education	122	123	12
	Other [fill in]	39	49	3
	Common responses to "Other" include: • Curricula was reviewed by the Adolescent Sexual Health Working Group • Curricula was reviewed or endorsed by county offices of education			

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		RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT		
QUESTION	**ANSWER CHOICES**	**BOTH GRADE LEVELS**	**ONLY MIDDLE SCHOOL**	**ONLY HIGH SCHOOL**
3. How does your school district ensure that instruction and materials are medically accurate? (Check all that apply)	Instruction and materials are reviewed by school district personnel, including teachers	190	202	35
	Instruction and materials are reviewed by a committee including stakeholders such as parents and outside groups	80	84	11
	Instruction and materials are reviewed by medical professionals	54	76	3
	Instruction and materials have been reviewed by the California Department of Education	127	116	12
	Other [fill in]	30	45	2
	Common responses to "Other" include: • Curricula were reviewed by the Adolescent Sexual Health Working Group • Curricula were endorsed by county offices of education			
4. In what ways does your school district ensure that district educators are qualified and trained to teach CHYA instruction? (Check all that apply)	Ensuring they receive training from a curriculum publisher	131	110	21
	Providing training to them from district or school personnel	117	102	26
	Verifying they have received relevant Continuing and Professional Education (CPE) credits	14	27	5
	Other [fill in]	51	84	9
	Common responses to "Other" include: • Third-party contractors teach CHYA curriculum at the district • County offices of education provided training or trained staff			
5. In what ways does your school district verify that contractors or outside groups are qualified and trained to teach CHYA instruction? (Check all that apply)	Verifying they have professional experience or certification(s)	90	99	12
	Verifying they have received relevant CPE credits	4	10	2
	Not applicable, my school district does not use contractors or outside groups to teach CHYA instruction	130	134	24
	Other [fill in]	22	29	2
	Common responses to "Other" include: • Counties ensured contractors and outside groups were credentialed • Districts relied on contractors and publishers to ensure they remained credentialed			
6. Do all of the individual schools in your school district use the same CHYA instruction and materials? (Check all that apply)	Yes, all of the individual schools within the school district use the same school district-approved curriculum.	202	219	35
	Not necessarily, schools within the school district may choose their own curriculum but it must be approved by the district.	17	3	4
	Not necessarily, schools within the district may choose their own curriculum and their own review and approval process.	3	1	1
	Other [fill in]	15	35	1
	The most common response to "Other" was districts that specified they only had one school.			

		RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT		
QUESTION	ANSWER CHOICES	BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL
7. What barriers or challenges has your school district encountered in implementing CHYA-compliant instruction? (Check all that apply)	Cost of developing or purchasing CHYA-compliant curriculum	28	37	7
	Cost of contracting for an outside agency to provide CHYA-compliant instruction	10	37	3
	Lack of available outside agencies to provide CHYA-compliant instruction	13	36	3
	Negative feedback from the community/parents regarding CHYA-compliant instruction and materials	61	69	8
	Unclear CHYA requirements	12	9	0
	Our district has not encountered barriers or challenges implementing CHYA-compliant instruction	127	119	23
	Other (please specify)	39	44	6
	Common responses to "Other" include: • Pushback from teachers • Difficulty with training teachers			

Source: School districts' responses to our survey.

Table B.3
Summary of District Responses to Questions Related to Parents Opting Students Out of CHYA Instruction

		RESPONSES OF DISTRICTS BY GRADE LEVELS TAUGHT			
QUESTION	ANSWER CHOICES	BOTH GRADE LEVELS	ONLY MIDDLE SCHOOL	ONLY HIGH SCHOOL	PERCENTAGE OF RESPONDENTS
1. For the 2023–24 school year, did your district track the number of middle school students required to receive CHYA instruction?	Yes	133	176		64.2%
	No	98	74		35.8
2. For the 2023–24 school year, did your district track the number of high school students required to receive CHYA instruction?	Yes	134		25	59.1
	No	97		13	40.9
3. For the 2023–24 school year, did your district track the number of middle school students who actually received CHYA instruction?	Yes	94	147		50.1
	No	137	103		49.9
4. For the 2023–24 school year, did your district track the number of high school students who actually received CHYA instruction?	Yes	101		22	45.7
	No	130		16	54.3
5. For the 2023–24 school year, did your district track the number of middle school students whose parents or guardians opted their student out of some or all CHYA instruction?	Yes	96	160		53.2
	No	135	90		46.8
6. For the 2023–24 school year, did your district track the number of high school students whose parents or guardians opted their student out of some or all CHYA instruction?	Yes	97		17	42.4
	No	134		21	57.6

Source: School districts' responses to our survey.

Table B.4
Summary of Percentages of Students Districts Provided With CHYA Education

PERCENTAGE OF REQUIRED STUDENTS SERVED	NUMBER OF DISTRICTS*	PERCENT OF DISTRICTS
90–100%†	219	90%
75–89%	9	4
60–74%‡	5	2
59% or less§	10	4

Source: School districts' responses to our survey.

* Of the districts we surveyed, 243 districts provided quantifiable responses for how many students they provided with CHYA education.

† Eight of the responding districts provided responses that suggested they provided CHYA education to more students than were required to receive it. We counted these districts as reporting that they served 100 percent of their required student population.

‡ The districts in this category are Alum Rock Union Elementary (Santa Clara County), Cuyama Joint Unified (Santa Barbara County), Douglas City Elementary (Trinity County), Latrobe Elementary (El Dorado County), and Moreno Valley Unified (Riverside County).

§ The districts in this category are Big Lagoon Union Elementary (Humbolt County), Carmel Unified (Monterey County), Earlimart Elementary (Tulare County), Fullerton Joint Union High (Orange County), Fountain Valley Elementary (Orange County), Green Point Elementary (Humboldt County), Pacifica Elementary (San Mateo County), Seiad Elementary (Siskiyou County), Springville Union Elementary (Tulare County), and Ukiah Unified (Mendocino County).

Appendix C

Scope and Methodology

The Audit Committee directed the California State Auditor to conduct an audit of the implementation of school districts' compliance with CHYA. We conducted this audit at Long Beach, Rocklin, Sonoma, and Tulare, and by performing a statewide survey of school districts required to provide CHYA instruction. Table C lists the objectives that the Audit Committee approved and the methods we used to address them. Unless otherwise stated in the table or elsewhere in the report, statements and conclusions about items selected for review should not be projected to the population.

Table C
Audit Objectives and the Methods to Address Them

	AUDIT OBJECTIVE	METHOD
1	Review and evaluate the laws, rules, and regulations significant to the audit objectives.	Reviewed the laws, rules, and regulations relevant to the audit objectives.
2	Survey high school districts, high and middle school districts, and unified school districts to determine whether and at which grade levels they provide mandatory CHYA-compliant instruction, and to determine levels of compliance. Further, for a selection of school districts, determine the following: a. Whether the selected school districts' instruction includes information about LGBTQ+ bodies and relationships. b. Whether the selected school districts' instruction includes information about sexual harassment, sexual assault, adolescent relationship abuse, intimate partner violence, and sex trafficking. c. The barriers the school districts have faced in implementing CHYA-compliant instruction. d. Whether the selected school districts have modified the CHYA-required curriculum and, if so, assess the process used and determine whether the modifications comply with state law.	• Designed survey questions for school districts to determine the grade levels that districts provide CHYA instruction and their levels of compliance. • Obtained a list of California school districts from CDE, determined which districts to include in our survey population, and administered a survey to all elementary, high, and unified school districts required to provide CHYA instruction. California districts are typically configured as elementary, high, or unified districts, and do not include "middle school districts." Elementary school districts can include up to grade 8, so we included those in the survey population as applicable. • Reviewed survey data for duplicate entries and logical consistency, and to ensure that only answers from relevant districts were included in the survey population. When necessary, resolved errors in survey responses to ensure that survey results were accurate. • Analyzed survey results to determine how school districts administered CHYA instruction, which instructional materials districts used, and the extent of self-reported compliance with CHYA content requirements. • Researched publicly available information to define "information about LGBTQ+ bodies and relationships." • Reviewed selected school districts' instructional materials and resources, including slides, textbooks, student handouts, and teacher guides and evaluated whether instructional materials fulfilled CHYA's content requirements and supported its purposes. • To further our review in specific areas of our scope, selected two schools per district. At Long Beach, Rocklin, and Sonoma we selected one middle school and one high school. At Tulare, which does not have middle schools, we selected two high schools. • Interviewed district administrators and teachers to obtain their perspective on barriers to implementing CHYA instruction. • Interviewed district administrators and teachers and reviewed relevant documents to determine whether districts or their schools made modifications to their CHYA instructional materials and what process they used to do so. • Evaluated whether these modifications affected the districts' or schools' compliance with CHYA's requirements by comparing the modifications against CHYA's requirements.

continued on next page . . .

	AUDIT OBJECTIVE	METHOD
3	Evaluate the selected school districts' processes for ensuring that all eligible students received the CHYA-compliant instruction. Identify the following for the school years 2021–22 through 2022–23: a. The number of students whose parents or guardians submitted an affirmative opt-out for CHYA-compliant instruction. b. The number of students whose parents or guardians requested to preview CHYA-compliant instructional materials and how the districts provided those materials. c. The percentage of students who received CHYA-compliant instruction and whether that percentage complies with state law.	• Interviewed staff and reviewed district records, such as course catalogs and enrollment data, to determine how the four selected districts provided CHYA instruction and assess whether they provided reasonable assurance that students received CHYA instruction. • Determined that our selected districts did not collect and maintain district-wide data on student opt-outs from CHYA instruction for academic years 2021–22 and 2022–23, which also prevented us from calculating the percentage of students who received CHYA instruction. • Interviewed district and school administrators and teachers and reviewed relevant district documents to determine the number of students whose parents requested previews of CHYA instructional materials, how the district notified parents of available previews, and how the district provided preview materials to parents.
4	Determine how the selected school districts provide training to applicable educators regarding CHYA-compliant instruction, whether these districts contract with outside entities to provide that instruction, and whether the districts have a process to ensure that all applicable educators receive such training.	• Determined the types of individuals delivering CHYA instruction, the process used by each district to provide training to applicable educators, and whether districts have a process to ensure that all applicable educators receive training on CHYA-compliant instruction by interviewing staff and reviewing relevant documents. • Evaluated whether districts conducting teacher training complied with state law. Reviewed the frequency of teacher training and whether all applicable teachers received training.

Source: Audit workpapers.

CALIFORNIA DEPARTMENT OF EDUCATION

TONY THURMOND
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

1430 N STREET, SACRAMENTO, CA 95814-5901 • 916-319-0800 • WWW.CDE.CA.GOV

October 3, 2025

Grant Parks*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Subject: The California Healthy Youth Act Audit - 2024-107

Dear Mr. Parks:

The California Department of Education (CDE) appreciates the opportunity to provide comments regarding the recommendations to the Legislature outlined in the California State Auditor's (CSA) Draft Audit Report on school districts' implementation of the California Healthy Youth Act – Audit Number 2024-107. As expressed during the exit conference and in a subsequent meeting with the CSA auditors, the CDE has concerns regarding these recommendations that will have a significant impact on our department if implemented without our proposed modifications. ①

Recommendation 1

"To improve school districts' compliance with CHYA statewide, the Legislature should require CDE to monitor school districts' compliance with CHYA requirements and should also establish the minimum number of districts that CDE should review each year."

CDE's Comments

CDE recognizes the value of monitoring compliance with CHYA. If the legislature were to require monitoring, the CDE would need additional positions. If the legislature were to require this, the number of school districts to be reviewed each year should be at the CDE's discretion. Alternatively, if the legislature were to consider establishing any minimum number of school districts to be reviewed each year, the legislature should specify that the CDE is only required to implement the requirements of the section in fiscal years in which sufficient funds have been appropriated. ②

Recommendation 2

"If the Legislature wishes to better position school districts to select instructional materials that comply with CHYA, it should require CDE to at least biennially publish on its website reviews of commonly available instructional materials that contain the following:

- A compliance score demonstrating how closely the materials align with CHYA.

* California State Auditor's comments appear on page 53.

Grant Parks, California State Auditor
October 3, 2025
Page 2

- Information about what content is noncompliant or missing from the materials.
- Guidance explaining how school districts could supplement the materials in order to comply with CHYA."

CDE's Comments

③ The CDE supports the State Board of Education (SBE) in their responsibility to adopt instructional materials. The SBE has the constitutional responsibility and authority to adopt instructional materials for grades one through eight (Article IX, Section 7.5 of the California Constitution) and statutory authority to adopt instructional materials for kindergarten. There are no state adoptions in grades nine through twelve. Education Code (*EC)* sections 60200–60206 describe the process for the adoption of instructional materials for these grades and mandate that submitted materials be evaluated for alignment with the adopted content standards and specific evaluation criteria approved by the SBE. The evaluation criteria are typically incorporated in the curriculum frameworks. The process for creating a curriculum framework takes between 2-3 years. A review of instructional materials involves recruitment of educators and a series of publicly held meetings for training, deliberations, and consideration by the Instructional Quality Commission and the SBE respectively. The process for running an adoption takes 2 years.

To evaluate instructional materials for high school grades for CHYA, the SBE would have to be given the authority to review those materials. The education code and California Code of Regulations that are designed for a full review for K-8 full basic year-long instructional material programs would have to be revised, or statute created, to be specific for CHYA materials reviews. Funding would have to be provided to create a curriculum framework with evaluation criteria around the review of instructional materials that is approved by the SBE.

For the specific recommendation, the alignment of materials with CHYA would be demonstrated through the evaluation criteria. The information of what content is noncompliant or missing from the materials would be demonstrated in the Instructional Materials Reviewer/Content Review Expert Report of Findings. The Guidance explaining how school districts could supplement the materials in order to comply with CHYA could be found in a curriculum framework.

If you have any questions regarding CDE's comments, please contact Alice Lee, Director, Audits and Investigations Division, by phone at 916-323-1547 or by email at AlLee@cde.ca.gov.

Sincerely,

David Schapira
Chief Deputy Superintendent of Public Instruction
Chief of Staff
California Department of Education

DS:kl

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Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE CALIFORNIA DEPARTMENT OF EDUCATION

To provide clarity and perspective, we are commenting on the response to our audit report from CDE. The numbers below correspond with the numbers we have placed in the margin of CDE's response.

CDE inaccurately states that it expressed the concerns it details in its response to us earlier in this audit. During our multiple meetings with its representatives, CDE did not tell us it would require additional staff to monitor CHYA compliance, nor did it suggest that it would need to evaluate CHYA instructional materials through the formal State Board of Education adoption process. We describe in the other comments below our concerns with CDE's responses pertaining to each issue. (1)

It is unclear to us whether CDE would actually need additional positions to monitor CHYA compliance. As we indicate on page 33, CDE informed us that it intends to conduct nine to 20 CHYA monitoring reviews per year. During the course of the audit, CDE indicated it intended to conduct these reviews utilizing its existing staff, regardless of whether the Legislature requires it to do so. (2)

CDE's response describes a process involving the State Board of Education that we do not recommend it to engage. CDE outlines requirements regarding the process for adopting instructional materials that are separate and distinct from the reviews we recommend it perform. Instead of recommending that CDE adopt instructional materials per the process it outlines, we recommend on page 33 that the Legislature direct CDE to provide information to school districts about commonly available materials. As we state on page 32, when we discussed this recommendation with CDE, it indicated that it was not prohibited from publishing this type of guidance. We also note on page 32 the fact that CDE has previously participated in performing similar reviews of this nature. (3)

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LONG BEACH UNIFIED • SCHOOL • DISTRICT

Date: October 3, 2025
Via email

Grant Parks, California State Auditor*
California State Auditor's Office
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Subject: Response to Confidential Draft Report – School Districts' Implementation of the California Healthy Youth Act (Report No. 2024-107)

Dear Mr. Parks:

Long Beach Unified School District acknowledges receipt of the *confidential* draft report regarding implementation of the California Healthy Youth Act (CHYA). In accordance with Gov. Code §§ 8545 and 8545.1(b)(2), we have limited circulation internally to personnel with a demonstrable business need and instructed all reviewers that any disclosure of the draft—or information it contains—is unlawful. We appreciate the opportunity to provide a written response for inclusion in the final published report.

District context & commitment. CHYA (Ed. Code §§ 51930–51939) requires comprehensive sexual health and HIV prevention education that is accurate, inclusive, and unbiased, delivered at least once in middle school and once in high school (e.g., §§ 51930(b), 51933, 51934), with parent notification and opt-out procedures (e.g., § 51938). Our district's Board Policy 6142.1 affirms this commitment by requiring instruction that is age-appropriate, medically accurate, inclusive of all students, and aligned with state standards and law. The policy also outlines procedures for professional development, use of approved curriculum materials, and transparency with parents and guardians regarding instructional content. Together, CHYA and Board Policy 6142.1 guide our district's practice, reflecting our commitment to full compliance and continuous improvement in curriculum fidelity, educator training, parent communication, and student access.

Factual clarifications. Enclosure A provides point-by-point clarifications where district records indicate different information than those reflected in the draft. Where applicable, we include page references. We request that the language used in the Draft Audit Report, "After we shared the results of our review, Long Beach developed additional instructional materials to ensure that it is complying with these and other CHYA requirements. We reviewed these materials and found that they were responsive to the areas of noncompliance that we noted and that the district would better ensure CHYA-compliant

① ②

* California State Auditor's comments begin on page 69.

③ instruction in the future by using these materials," (page 19) would be noted in the Key Findings and Recommendations section of the Final Audit Report.

Corrective actions & timelines. Enclosure B outlines actions already taken and those scheduled—each mapped to the audit's scope and legislative requirements, with owners and due dates. These actions align with the audit's published scope and objectives.

Supporting exhibits. Enclosure C includes visual representations and additional details about information provided elsewhere in our response.

Point of contact. Please direct any follow-up to:
Dr. Esther Deth, School Wellness & College Preparation Coordinator, edeth@lbschools.net, 562-490-7281.

We appreciate the professionalism of your team and the clarity the audit provides for continuous improvement. Thank you for considering our clarifications and planned actions for inclusion in the final report.

Respectfully,

Dr. Damita Myers-Miller

Interim Assistant Superintendent
Office of Curriculum, Instruction & Professional Development
Long Beach Unified School District

Enclosures:
A—Factual Clarifications Crosswalk
B—Corrective Action Plan & Timeline
C—Supporting Exhibits (index)

Enclosure A - Factual Clarifications Crosswalk

Enclosure A provides point-by-point clarifications where district records indicate different information than that reflected in the draft. Where applicable, we include page references.

Draft Report Statement (Verbatim)	District Clarification/Correction	Supporting Evidence	Net Effect	
"[Long Beach's] Instructional Materials Did Not Comply with All of CHYA's Content Requirements We found that the instructional materials at [Long Beach] complied with 85 percent of CHYA's content requirements at the middle school level and 88 percent at the high school level. For example, [Long Beach] lacked information about sexual assault [and] how mobile applications can be used for human trafficking" (Page 1).	This statement was based on an initial review of our curriculum. We revised our Middle and High School curriculum based on our discussions with the State Auditor's Office to address the gaps in compliance and ensure full compliance. This is reflected later on in the draft report.	"After we shared the results of our review, Long Beach developed additional instructional materials to ensure that it is complying with these and other CHYA requirements. We reviewed these materials and found that they were responsive to the areas of noncompliance that we noted and that the district would better ensure CHYA-compliant instruction in the future by using these materials" (Page 19).	Gap Addressed	(1)

Draft Report Statement (Verbatim)	District Clarification/Correction	Supporting Evidence	Net Effect
①④ **"[Long Beach] Did Not Ensure That Teachers Received Training as the Law Requires**[...] CHYA requires [...] that districts provide periodic training on new developments in the scientific understanding of HIV. However, [Long Beach could not] demonstrate that [it] had provided training sufficient to meet CHYA's requirements. For example, Long Beach's training focused more on the format of its instructional materials than on the medical knowledge that teachers may need to accurately instruct students" (Page 2).	This statement was based on an initial review of training provided to Long Beach teachers by the Los Angeles County Office of Education from 2021-2024. Beginning in the spring of 2025, we developed a new training approach in collaboration with the Long Beach Department of Human Services. Our revised training satisfies requirements regarding the scientific understanding of HIV. This is reflected later on in the draft report.	"The district had contracted with LACOE to provide sexual health education training to its teachers before 2025 when it began to offer its own training in partnership with the city of Long Beach's Department of Health and Human Services. LACOE provided the district with training on the PPP curriculum" (Page 31). "For example, the training provides information about STIs and HIV—which is information the previous training did not cover" (Page 32).	Gap Addressed
① "The law does not require districts to keep records of how many parents opt their students out of this instruction [...][Long Beach did not maintain] such records for school years 2021-22 and 2022-23" (Page 2).	Although not a CHYA requirement, the district did begin to keep parent opt-out records in the 2023-2024 school year. This is reflected later on in the draft report.	"Long Beach recently started tracking out-outs in 2023-24" (Page 35).	Compliant

Draft Report Statement (Verbatim)	**District Clarification/Correction**	**Supporting Evidence**	**Net Effect**
"The instructional materials used by [Long Beach] met 85 to 88 percent of the content requirements established by the California Healthy Youth Act (CHYA). Because these materials were not fully compliant, students at [Long Beach were at a greater risk of missing valuable instruction that could benefit their health and well-being [...] At [Long Beach], the instructional materials we reviewed did not include all of the topics that CHYA requires districts to include in their instruction" (Page 9).	This statement, as well as the examples of non-compliance provided on pages 9-18 was based on an initial review of our curriculum. We revised our Middle and High School curriculum based on our discussions with the State Auditor's Office to address the gaps in compliance and ensure full compliance. This is reflected later on in the draft report.	"After we shared the results of our review, Long Beach developed additional instructional materials to ensure that it is complying with these and other CHYA requirements. We reviewed these materials and found that they were responsive to the areas of noncompliance that we noted and that the district would better ensure CHYA-compliant instruction in the future by using these materials" (Page 19).	Gap Addressed

(1)

Draft Report Statement (Verbatim)	District Clarification/Correction	Supporting Evidence	Net Effect
①④ **"[Long Beach] Did Not Ensure That Teachers Received Training as the Law Requires** [...] could not demonstrate that it trained teachers in accordance with CHYA's requirements [...] could not show that the training materials were aligned with CHYA's requirements [...] Because [Long Beach has] not established processes to adequately train its teachers, the quality of instruction those teachers provide to students may be lower than it otherwise would have been. [...] **[Long Beach] Could Not Demonstrate That It Trained Teachers in Accordance With CHYA's Requirements**" (Page 30).	This statement was based on an initial review of training provided to Long Beach teachers by the Los Angeles County Office of Education from 2021-2024. Beginning in the spring of 2025, we developed a new training approach in collaboration with the Long Beach Department of Human Services. Our revised training satisfies requirements regarding the scientific understanding of HIV. This is reflected later on in the draft report.	"The district had contracted with LACOE to provide sexual health education training to its teachers before 2025 when it began to offer its own training in partnership with the city of Long Beach's Department of Health and Human Services. LACOE provided the district with training on the PPP curriculum" (Page 31). "For example, the training provides information about STIs and HIV—which is information the previous training did not cover" (Page 32).	Gap Addressed

Draft Report Statement (Verbatim)	**District Clarification/Correction**	**Supporting Evidence**	**Net Effect**
"The district indicated it formerly used paper sign-in sheets to monitor training attendance and began tracking teachers' compliance with its three-year training requirement through a training dashboard in March 2024. However, because the district's data did not have complete records about each teacher who provided CHYA instruction, we were unable to determine the extent to which Long Beach ensured that its teachers complied with its three-year training cycle requirement" (Pages 30-31).	This audit reviewed training records beginning in the 2021-2022 school year. We began using our training dashboard in the spring of 2024, to monitor who was due for re-training. This was done in preparation for the 2024-2025 school year. Teachers trained in the 2021-2022 school year were due for re-training in the 2024-2025 school year. Therefore, our dashboard does provide data indicating that all teachers who were due for re-training within the scope of this audit were identified and trained, and that we did comply with our three-year training cycle requirement.	Training Dashboard Screenshot (See Enclosure C within this response)	Compliant

(5)

Enclosure B - Corrective Action & Timeline

Enclosure B outlines actions already taken and those scheduled—each mapped to the audit's scope and legislative requirements, with owners and due dates. These actions align with the audit's published scope and objectives.

Ed Code Requirement	Identified Gap (per draft report)	Corrective Action	Responsible Owner	Due Date	Measure of Completion
51933-51934 Criteria for Instruction and Content Required	"The instructional materials used by [Long Beach] met 85 to 88 percent of the content requirements established by the California Healthy Youth Act (CHYA). Because these materials were not fully compliant, students at [Long Beach were at a greater risk of missing valuable instruction that could benefit their health and well-being [...] the instructional materials we reviewed did not include all of the topics that CHYA requires districts to include in their instruction" (Page 9).	We revised our Middle and High School curriculum based on our discussions with the State Auditor's Office to address the gaps in compliance and ensure full compliance. Complete an annual review of legislation to identify new requirements and modify curriculum as necessary.	School Wellness & College Preparation Coordinator PE/Health Coach	Submitted to CA State Auditor's Office on 9/10 - **Complete** Annually, prior to training and release of curriculum documents.	Reviewed by State Auditor's Office - "We reviewed these materials and found that they were responsive to the areas of noncompliance that we noted" (Page 19). Review by the Program Administrator of the Office of Curriculum, Instruction, and Professional Development

Ed Code Requirement	Identified Gap (per draft report)	Corrective Action	Responsible Owner	Due Date	Measure of Completion
51933-51934 Criteria for Instruction and Content Required	"[A teacher at Long Beach] modified instructional materials in a way that [Redacted] increased the risk that students would not learn about required topics" (Page 9). "**Teachers Made Modifications to Instructional Materials That Increased Their Risk of Noncompliance With CHYA** [...] Long Beach [Redacted] was likely also noncompliant at one school site because of changes that a teacher at the school made to the instructional materials after district adoption" (Page 25).	We will update our curriculum documents and teacher training to clarify the expectation that the curriculum may not be modified.	School Wellness & College Preparation Coordinator PE/Health Coach	January 2026	Review by the Program Administrator of the Office of Curriculum, Instruction, and Professional Development

Ed Code Requirement	Identified Gap (per draft report)	Corrective Action	Responsible Owner	Due Date	Measure of Completion
51931.e -"Instructors trained in the appropriate courses" means instructors with knowledge of the most recent medically accurate research on human sexuality, healthy relationships, pregnancy, and HIV and other sexually transmitted infections.	"We also reviewed the training Long Beach has provided since 2025 and found it was improved in some respects over the previous training, but it still did not address the full range of training required by CHYA. For example, the training provides information about STIs and HIV—which is information the previous training did not cover—but does not ensure that instructors are trained in the subjects of healthy relationships or medical information about pregnancy" (Page 32).	As indicated in the Audit Report and elsewhere in this response, we recently revised our curriculum to fully address CHYA requirements. Our next step is to revise our training so that it fully prepares teachers to deliver the revised content. Our revised curriculum includes information about healthy relationships and medical information about pregnancy, so our training will be updated to fully address this need.	School Wellness & College Preparation Coordinator PE/Health Coach	January 2026	Review by the Program Administrator of the Office of Curriculum, Instruction, and Professional Development

Enclosure C - Supporting Exhibits (index)

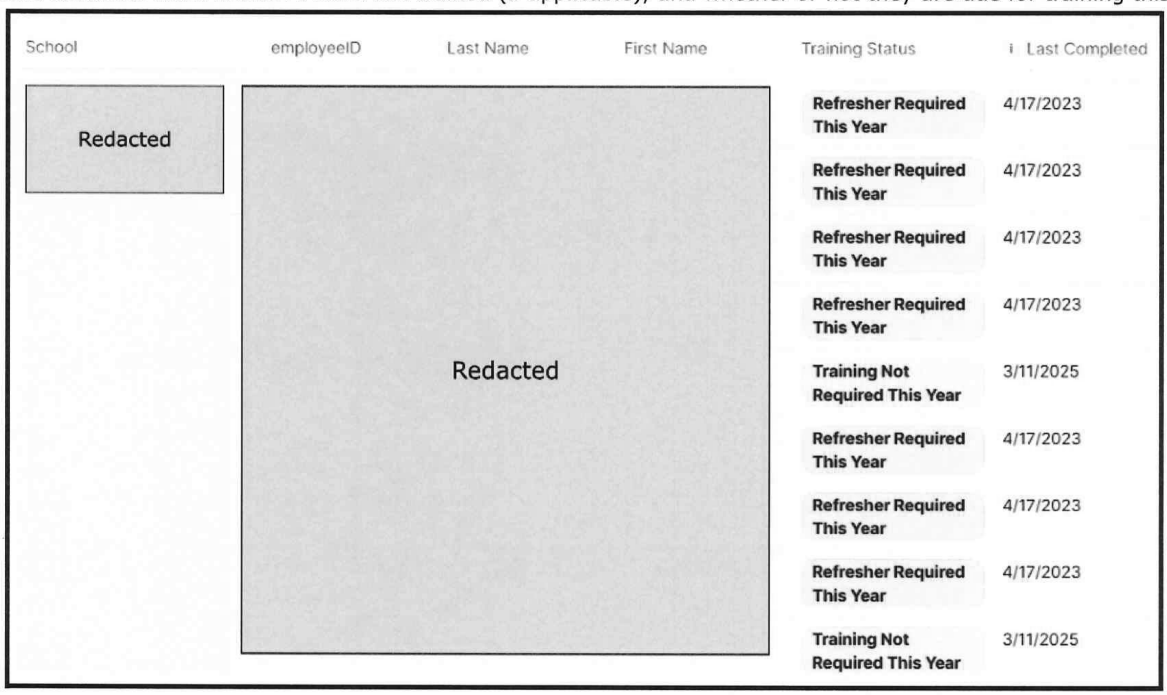
Enclosure C includes visual representations and additional details about information provided elsewhere in our response.

Enclosure C1 - Training Dashboard

Enclosure C2 - CHYA Curriculum Supplements

Enclosure C1 - Training Dashboard

This is a sample screenshot from our training dashboard. We have redacted identifying information to maintain the privacy of the school and staff members. The dashboard triangulates data from multiple sources to identify the teachers in our district who will deliver CHYA-Aligned instruction in the 2025-26 school year, as well as their training status. The dashboard identifies when teachers were last trained (if applicable), and whether or not they are due for training this year.



Enclosure C2 - CHYA Curriculum Supplements

In order to ensure we are covering all instructional requirements of the CA Healthy Youth Act, we've developed additional slides for some lessons in our adopted curriculum. The table below summarizes the gaps in compliance identified by the State Auditor's office, as well as the content we've added. Regarding our supplemental materials, the State Auditor's office indicated, "We reviewed these materials and found that they were responsive to the areas of noncompliance that we noted and that the district would better ensure CHYA-compliant instruction in the future by using these materials" (Page 19).

Instruction Must Align With These Content requirements to Comply With CHYA:	**Compliance as assessed by the CA State Auditor's Office**		**Lesson Supplements Developed**	
	High School	**Middle School**	**High School**	**Middle School**
• How HIV and other STIs are and are not transmitted • Relative risk of infection from specific behaviors	58%	75%	Information added to Lesson 9	Information added to Lesson 9
• Abstinence from sexual activity and injection drug use in preventing HIV and other STIs • Sexual abstinence in preventing pregnancy • Value of delaying sexual activity	86%	86%	Information added to Lesson 9	Information added to Lesson 9
• Effectiveness and safety of methods to prevent HIV and STIs, including antiretroviral medication	67%	67%	Information added to Lesson 9	Information added to Lesson 9
• Effectiveness and safety of contraceptive methods • Emergency contraception • Parenting, adoption, abortion, safe surrender • Importance of prenatal care	100%	88%	n/a	Information added to Lesson 6

Instruction Must Align With These Content requirements to Comply With CHYA:	**Compliance as assessed by the CA State Auditor's Office**		**Lesson Supplements Developed**	
	High School	**Middle School**	**High School**	**Middle School**
• Sexual assault, harassment and abuse • Nature and prevalence of human trafficking • Strategies to prevent trafficking and seek help • How social media and apps are used for trafficking	75%	55%	Information added to Lessons 4 and 5	Information added to Lessons 4 and 5
• Adolescent relationship abuse • Intimate partner violence • Early warning signs • Resources and hotlines are available for victims	100%	71%	n/a	Information added to Lesson 4
• Gender, Gender expression and gender identity • Harm of negative gender stereotypes	100%	100%	Information added to Lesson 2	Information added to Lesson 2
• Align with and support the purposes of CHYA	90%	90%	Statistics corrected in Lessons 0 (Getting Started) and 7	Statistics corrected in Lessons 0 (Getting Started) and 7
• Menstrual Health	0%	50%	Information added to Lesson 1	Information added to Lesson 1

Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM LONG BEACH UNIFIED SCHOOL DISTRICT

To provide clarity and perspective, we are commenting on the response to our audit report from Long Beach. The numbers below correspond with the numbers we have placed in the margin of the district's response.

The information in our report is correct and requires no further adjustment. As we explain on page 9, we reviewed the district's most recently used instructional materials as of the time we conducted our review. That review began in spring 2025 and concluded during the summer. As our report notes in the section that begins on page 9, we found that the district lacked fully-compliant instructional materials. After we brought the gaps in the district's instructional materials to its attention, the district took corrective action, which we acknowledge in our report on page 16. As a result, we recommended on page 24 that the district annually review its instructional materials for compliance with CHYA. The district's response indicates that it will be implementing this recommendation. Further, the materials the district uses to train its teachers changed in 2025, while we were performing our audit. To be comprehensive in our review, we examined both the materials the district used in previous years and its 2025 materials. Our report describes our review of these materials, on page 26 where we present our conclusion that neither set of training materials fully complies with CHYA's training requirements. Accordingly, we recommended on page 29 that Long Beach review its training and bring it into compliance with CHYA's requirements. (1)

The presentation of the key findings on pages 1 and 2 accurately summarizes the results of our audit. Accordingly, we determined that no changes are necessary. (2)

When preparing our draft audit report for publication, page numbers shifted. Therefore, the page numbers that Long Beach cites throughout its response do not correspond to the page numbers in our final report. (3)

Although Long Beach states that it has fully addressed the gap we identified in its compliance with CHYA's teacher training requirements, we determined that its recent efforts to improve its training program continue not to satisfy all CHYA requirements. On page 26, we describe how its training in 2025 still does not include information about healthy relationships or medical information about pregnancy. Moreover, Long Beach acknowledges this gap in its response, as page 64 indicates. (4)

Long Beach's response indicates that its training data are complete enough to demonstrate compliance with its three-year training cycle, but our review found otherwise. We reviewed whether Long Beach complied with its three-year training cycle requirement as of school year 2023–24, as this was the year for which data was most recently available when we began our review. Based on the records Long Beach provided from both its training dashboard and paper sign-in (5)

sheets, we could not determine whether numerous teachers who provided CHYA instruction had received training in the three years before school year 2023–24. During our audit, Long Beach explained that this was because its dashboard may not include records for teachers who have left the district, and because teachers may have missed training opportunities in school years 2021–22 and 2022–23 due to the COVID-19 pandemic, among other reasons. Therefore, our conclusion that the district's training data were not complete enough for us to determine compliance with the three-year training cycle is correct. Nevertheless, we determined that the dashboard fulfills its purpose of identifying current teachers who need training, and accordingly did not issue recommendations to Long Beach in this area.

Rocklin Unified School District
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Roger Stock, Superintendent
Jennifer Stahlheber, Deputy Superintendent Business & Operations

Tony Limoges, Associate Superintendent, Human Resources
Marty Flowers, Associate Superintendent, Secondary Education
Bill MacDonald, Associate Superintendent, Elementary Education

October 2, 2025

Grant Parks*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Mr. Parks:

The Rocklin Unified School District (RUSD) formally acknowledges receipt and has concluded its internal review of the confidential draft audit report, 2024-107, regarding the implementation of the California Healthy Youth Act (CHYA), a review initiated at the request of the Joint Legislative Audit Committee. We affirm our understanding and adherence to the requirement that this preliminary document and its contents remain confidential. Consequently, this response is submitted without access to the full, unredacted version of the final report. (1)

RUSD fulfilled its legal obligation to participate in the review conducted by the California State Auditor's Office. The District notes the reported content accuracy rates for CHYA requirements: 79% in middle schools and 83% in high schools.

RUSD concurs with the majority of the audit's findings and recommendations, particularly those focused on elevating curriculum accuracy and ensuring sustained professional development for our instructional staff. While the District has already commenced proactive measures to resolve the deficiencies identified during the curriculum review, we must emphasize a significant limitation in the audit's scope. (2)

The State Auditor's report itself stipulates that the evaluation was confined solely to a review of written curriculum materials, with no concurrent classroom observations. This analytical approach omits crucial components of pedagogical delivery, such as direct instruction, open class discussions, or teacher-provided clarifications.

RUSD submits that the noted deficiencies may have been mitigated or entirely resolved had the auditors performed on-site classroom observations to evaluate CHYA implementation in practice. This consideration is particularly relevant regarding instances of teacher-initiated curriculum modifications conducted without a formal review process, which are often necessitated by the integration of updated data or research. Furthermore, we note that the materials review was conducted primarily during the summer recess, which impeded the opportunity for necessary follow-up meetings with the teaching staff involved. (2) (3)

We agree with the recommendation that instructional resources require updating and improvement. The report highlighted several content gaps, including, but not limited to: outdated/inaccurate statistical

Board Members: Rachelle Price · Dereck Counter · Julie Hupp · Tiffany Saathoff · Michelle Sutherland

* California State Auditor's comments appear on page 73.

data, limited coverage of mobile applications related to human trafficking, and partial compliance with the January 2025 menstrual health mandate. RUSD is unwaveringly committed to ensuring all 105 distinct content requirements of the CHYA are taught.

However, we must reiterate the structural challenge that as the state imposes new instructional requirements, it does not provide commensurate fiscal resources for the acquisition of updated materials and the provision of essential staff training to fulfill these evolving mandates.

Regarding professional development, RUSD affirms the necessity of providing updated training to all CHYA educators and improving the procedural tracking of required "periodic" training. Recognizing the need for a more structured approach, particularly concerning advances in the scientific understanding of HIV, RUSD has already instituted a new three-year recurring update training cycle. This comprehensive schedule was developed in collaboration with relevant state entities, including those affiliated with the California Department of Public Health, which assists the California Healthy Kids Resource Center in vetting CHYA materials.

The District also wishes to mention that while lawmakers continue to add requirements to the CHYA, which now encompasses 105 different content requirements and mandated topics like human trafficking and domestic violence hotlines, there has been no corresponding removal of previous mandates, notwithstanding the recent addition of new high school graduation requirements.

RUSD appreciates the audit report finding that the District is in full compliance with all state requirements for parental notification concerning CHYA instruction.

② Despite the aforementioned constraints regarding the audit's scope, RUSD has already commenced an action plan to address the identified issues, including rectifying content omissions and ensuring full legal compliance through a comprehensive curriculum update process and the implementation of our new three-year training schedule. The Rocklin Unified School District is committed to continuous improvement in our efforts to provide the highest quality educational experience for all students within the district.

Sincerely,

Roger Stock
Superintendent

Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM ROCKLIN UNIFIED SCHOOL DISTRICT

To provide clarity and perspective, we are commenting on the response to our audit report from Rocklin. The numbers below correspond with the numbers we have placed in the margin of the district's response.

We provided Rocklin a copy of the draft audit report that excluded information specific to the other audited entities. Rocklin's copy contained all of the report content that pertained to it and thus was fully able to comment on all applicable findings, conclusions, and recommendations. (1)

Our audit report specifically addresses the methods we used to review compliance with CHYA and the implications on our conclusions. On page 20, we explain our primary reason for not observing classroom instruction, namely that doing so would have been disruptive to students learning about potentially sensitive topics. Further, our presence in the classroom would have potentially influenced the approach that the teachers used to deliver CHYA instruction, making the value of such observation questionable. Although we acknowledge on page 15 the effects our methods had on our audit results, we stand by our conclusions and recommendations pertaining to Rocklin, which are based on sufficient and appropriate audit evidence. Moreover, Rocklin's response selectively emphasizes the positive effects teachers' delivery of instructional materials may have had on compliance with CHYA. As we note on page 16, it is just as possible that teachers did not deliver instruction about required topics despite those topics being included in their instructional materials. Therefore, it is not clear to us, as Rocklin suggests, that classroom observation would have resulted in a more accurate understanding of the district's compliance or even that the gaps in instructional materials would have been addressed by classroom instruction. (2)

Rocklin incorrectly suggests that the timing of our audit impeded the opportunity for meetings with the teaching staff because a portion of our review occurred during the summer. We conducted our review with sufficient time to discuss our findings with teachers and district administrators, who made themselves available for these meetings. We then provided time for the district administrators to review the results of our audit with teaching staff and then met with the administration and teaching staff to address any questions about our conclusions. There was no impediment to our audit. (3)

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Rena Seifts,
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SVUSD
Sonoma Valley Unified School District

Trustees:
David Bell
Anne Ching
Gerardo Guzman
Catarina Landry
Jason Lehman

October 2, 2025

Grant Parks
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

SUBJECT: Sonoma Valley Unified School District Response to Report No 2024-107

Dear California State Auditor Grant Parks,

Sonoma Valley Unified School District (SVUSD) has reviewed the audit findings, conclusions and recommendations presented in Report No 2024-107 (Report).

SVUSD intends to take appropriate action to address the findings in the Report specific to:

- Revisit our curriculum to be fully compliant with all of CHYA's content requirements.
- Implement and track ongoing teacher training as the law requires

SVUSD is committed to continuous improvement and looks forward to sharing its implementation progress in the upcoming review.

Regards,

Rena Seifts
Acting Superintendent

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October 3, 2025

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Jason Bonds
Director of Facilitiies

Donny Trimm
Director of Technology

Grant Parks*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Mr. Parks:

The Tulare Joint Union High School District's team has reviewed the California State Auditor's draft audit report (2024-107) titled California Healthy Youth Act Implementation. The Tulare Joint Union High School District appreciates the opportunity to respond to the report. (1)

The Tulare Joint Union High School District worked collaboratively with the California State Auditor's office to set-up in-person and virtual meetings, provide digital copies of documents and evidence requested, and responded to numerous emails and follow-up questions to the best of our ability. Additionally, we understand the audit requirements set forth by the Joint Legislative Audit Committee and the parameters for which the audit is conducted. Generally speaking, we agree with the findings of the audit committee and will address the recommendations as such. However, it should be noted that even though there are "findings and recommendations" to be followed up on, the report does not fully reflect all the positive areas and work that is in compliance with the California Healthy Youth Act Implementation in the Tulare Joint Union High School District. (2)

Recommendation #1

To improve compliance with CHYA, Tulare should perform a detailed review of CHYA's requirements and amend or supplement its instructional materials so that they address all required topics. Further, Tulare should annually review the information in its instructional materials to ensure that it is accurate, up-to-date, and complies with any changes to state law.

TJUHSD Response:

The Tulare Joint Union High School District has already begun the process of reviewing the CHYA requirements in an effort to assure they are covered by all instructional materials or supplemental instructional materials. This includes updating pacing guides to make sure all requirements are covered during instruction. Tulare Joint Union High School District will annually review the requirements of CHYA to ensure that all instructional materials are accurate, up-to-date, and comply with any changes to state law.

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* California State Auditor's comments appear on page 79.

Recommendation #2

To ensure that it periodically trains all school district personnel who provide CHYA instruction, Tulare should adopt policies and procedures that do the following:

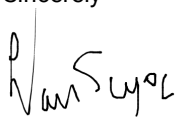
- Define the frequency and content of training for teachers who provide CHYA instruction. The defined frequency should ensure that teachers receive timely training on the most recent, medically accurate information and that no teacher provides CHYA instruction without having first received the training.
- Track compliance with the required training.

TJUHSD Response:

The Tulare Joint Union High School District will annually train all teachers who are providing CHYA instruction to ensure that all teachers are trained on the requirements of CHYA, recent changes to CHYA, and medically accurate information. All CHYA instructors will be required to participate in the training prior to instructing students. The Tulare Joint Union High School District will keep an annual record of teachers participating in the CHYA training.

Again, we appreciate the opportunity to respond to the audit and thank the auditors for their feedback and communication throughout this process.

Sincerely



Lucy Van Scyoc
Superintendent, Tulare Joint Union High School District

Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM TULARE JOINT UNION HIGH SCHOOL DISTRICT

To provide clarity and perspective, we are commenting on the response to our audit report from Tulare. The numbers below correspond with the numbers we have placed in the margin of the district's response.

Tulare reviewed a redacted copy of the draft audit report that contained only the information pertaining to our review of Tulare and did not include the report's full title. ①

Tulare's response does not specify the information it believes is missing from our report. Nevertheless, we believe that our report thoroughly addresses the objectives the Audit Committee directed us to audit, as stated in the Scope and Methodology. In particular, our audit results include observations about Tulare's compliance with CHYA. For example, throughout the section that begins on page 9, we provide examples of the ways in which Tulare's instructional materials comply with CHYA's requirements. On pages 15 and 16, we provide Tulare's perspective on our findings, including the areas in which it believed it was in greater compliance than our findings indicated. Finally, we report on page 28 that Tulare complied with requirements to notify parents about upcoming instruction, parents' ability to preview instructional materials, and parents' ability to opt their student out of instruction. ②